

GOVERNMENT EXHIBIT 6

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF RHODE ISLAND
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5 IN RE: GRAND JURY PROCEEDINGS
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12 Videotaped deposition of RICHARD G. WILEY,
13 a Witness herein, taken on behalf of the United
14 States Attorney, on WEDNESDAY, SEPTEMBER 30, 2009,
15 scheduled at 9:11 a.m., at Watch Hill Care & Rehab,
16 77 Watch Hill Road, Westerly, Rhode Island, before
17 Diane J. DeStefano, Registered Professional Reporter,
18 a Notary Public in and for the State of Rhode Island.
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22

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COPY

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FBI AGENT PAMELA McDAID

VIDEOPHOTOGRAPHER: ODI JIN WONG

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GOVERNMENT'S:

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OBJECTORS':

NO.	DESCRIPTION	PAGE
A	Written objection	7

In Re Grand Jury Proceedings

Richard G. Wiley

<p style="text-align: right;">Page 5</p> <p>1 (Government's Exhibits 1 through 7 were premarked)</p> <p>2 THE VIDEOGRAPHER: We are now recording and</p> <p>3 on the record. My name is Odi Jin Wong. I am a</p> <p>4 legal video specialist for National Video Reporters,</p> <p>5 Inc. Today is September 30th, 2009 and the time is</p> <p>6 9:11 a.m. This is the deposition of Richard Wiley in</p> <p>7 the matter of "In Re Grand Jury Proceedings." This</p> <p>8 deposition is being taken at 77 Watch Hill Road,</p> <p>9 Westerly, Rhode Island.</p> <p>10 The court reporter is Diane DeStefano.</p> <p>11 Counsel, please state your appearances for the record</p> <p>12 and the court reporter will administer the oath.</p> <p>13 MR. McADAMS: This is John McAdams,</p> <p>14 Assistant United States Attorney representing the</p> <p>15 United States in this deposition.</p> <p>16 MR. VILKER: My name is Lee Vilker. I am</p> <p>17 also an Assistant United States Attorney representing</p> <p>18 the government in this deposition.</p> <p>19 MR. PINE: Jeffrey Pine. I represent</p> <p>20 Raymour Radhakrishnan.</p> <p>21 MR. RADHAKRISHNAN: Raymour Radhakrishnan.</p> <p>22 MR. FLANDERS: Robert Flanders representing</p> <p>23 Joseph Caramadre.</p> <p>24 MR. TRAINI: Anthony Traini representing</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 7</p> <p>1 MR. TRAINI: I would ask that the</p> <p>2 stenographer mark the -- the two-page written</p> <p>3 objection as Exhibit A to the deposition, and I'm</p> <p>4 handing the original to the stenographer.</p> <p>5 (Whereupon, Exhibit A was marked.)</p> <p>6 MR. McADAMS: Counsel and the -- the</p> <p>7 government have also discussed that this deposition</p> <p>8 is not a typical civil deposition. This is a --</p> <p>9 preserving trial testimony for a trial if one occurs</p> <p>10 in this matter. To that end, counsel will make</p> <p>11 objections if -- if they have them. They will make</p> <p>12 them contemporaneously in order to give the</p> <p>13 questioner an opportunity to rephrase the question or</p> <p>14 ask differently if necessary.</p> <p>15 We've also discussed the fact that if</p> <p>16 counsel for any of the targets makes an objection,</p> <p>17 that all targets reserve that objection for purposes</p> <p>18 of the record so that we don't need to have each</p> <p>19 counsel repeat the same objection on the record.</p> <p>20 MR. TRAINI: John, if -- if you don't mind,</p> <p>21 just to clarify something. My understanding of the</p> <p>22 deposition procedure that's being used is that this</p> <p>23 is, in fact, similar to a Rule 27 deposition in that</p> <p>24 the objections that we're required to make now are</p> <p>25 only as to the form of the questions.</p>
<p style="text-align: right;">Page 6</p> <p>1 MR. MacFADYEN: John MacFadyen representing</p> <p>2 [REDACTED]</p> <p>3 MR. McADAMS: This is John McAdams, United</p> <p>4 States Attorney.</p> <p>5 RICHARD G. WILEY,</p> <p>6 called as a witness and having first been duly</p> <p>7 sworn, testifies as follows:</p> <p>8 MR. McADAMS: This is John McAdams,</p> <p>9 Assistant United States Attorney speaking.</p> <p>10 Mr. Wiley, before we ask you questions, before we</p> <p>11 begin asking you questions, I just want to note for</p> <p>12 the record that -- that counsel for all the named</p> <p>13 targets are present. The named targets have been</p> <p>14 invited. Mr. Raymour Radhakrishnan is present.</p> <p>15 [REDACTED] Joseph Caramadre and [REDACTED]</p> <p>16 [REDACTED] are not present, however their counsel is</p> <p>17 here.</p> <p>18 This deposition is being taken pursuant to</p> <p>19 Rule 15 of the Rules of Criminal Procedure pursuant</p> <p>20 to an order authorized by United States District</p> <p>21 Court Judge William Smith. Counsel for the targets</p> <p>22 have provided to the government a written objection</p> <p>23 which the government and counsel have agreed they</p> <p>24 will preserve for purposes of the record. We can</p> <p>25 mark it as Deposition Exhibit A.</p>	<p style="text-align: right;">Page 8</p> <p>1 We automatically have our right to raise</p> <p>2 our other objections, whatever they might be, at the</p> <p>3 time that the deposition is offered. We don't have</p> <p>4 to make specific depositions (sic) to relevancy,</p> <p>5 materiality at this stage in this proceeding. Do</p> <p>6 you understand it differently?</p> <p>7 MR. VILKER: I do understand it</p> <p>8 differently. This is something -- in having</p> <p>9 discussed this with a number of other people who have</p> <p>10 done this, this is the equivalent of being in court</p> <p>11 on trial.</p> <p>12 Unlike a deposition in a typical civil case</p> <p>13 where later there's typically an opportunity to</p> <p>14 introduce the live testimony in court, this will</p> <p>15 likely be the government's only opportunity to</p> <p>16 present this witness. So, therefore, if you have any</p> <p>17 objections, whether it be to form or not to form, you</p> <p>18 must state them contemporaneously in order to give us</p> <p>19 an opportunity to rephrase the question.</p> <p>20 You might have a legitimate objection and</p> <p>21 we want to have a right to think about the objection</p> <p>22 and rephrase it in a way that the question will not</p> <p>23 be ultimately disallowed, the answer disallowed.</p> <p>24 MR. PINE: I mis --</p> <p>25 MR. TRAINI: It was my understanding, Lee,</p>

5 (Pages 5 to 8)

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1 is that the way it works is that other than to form,
2 we can make our other objections later on and they
3 get edited out of the video.

4 MR. VILKER: The -- no. It's the later on
5 part that we're having a disagreement with.

6 MR. TRAINI: Well, we ought to get that
7 resolved --

8 MR. PINE: Yeah.

9 MR. TRAINI: -- before we go too much
10 further down the line.

11 MR. VILKER: Well, you preserve the
12 objection --

13 MR. TRAINI: Right.

14 MR. VILKER: -- and you can make the
15 objection. You can say, "This calls for hearsay," to
16 which we have a choice at that point, or vice versa
17 when you're doing the questioning, to say, "Well, we
18 don't believe that's objectionable and please answer
19 the question," and then you've --you've preserved the
20 objection and the judge can later rule on it. Or if
21 we believe that it -- we agree with your objection,
22 we then have the right to rephrase the question.

23 MR. FLANDERS: Our position is that
24 objections as to substance are reserved for later at
25 trial or whenever you attempt to introduce this. We

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1 understand your position differs with that but I want
2 it to be on the record as saying that our position is
3 we're not waiving the right to make substantive
4 objections now simply by not presenting them.

5 We will raise any objections as to form but
6 our position is that we reserve the right to make
7 substantive objections later. And we understand that
8 you differ with that and are taking the position that
9 we have to raise them now. We disagree.

10 MR. VILKER: Okay.

11 MR. TRAINI: Also, while we're at it, since
12 we're putting things on the record, in support of
13 Mr. Flanders' statement, given the fact that we have
14 no indictment, we have no charges, we have no theory
15 of prosecution, we believe that it's relatively
16 impossible for us to state with particularity grounds
17 for objection as to relevance, materiality, and a
18 whole bunch of other things, and so we wouldn't be in
19 a position to effectively do that anyway.

20 And notwithstanding any other provisions
21 of the rules or -- and we respect your position on --
22 on the objections, we'll make the objections that we
23 feel we can make and reserve whatever we can't until
24 the time that you attempt to use the deposition I
25 think.

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1 MR. VILKER: Okay. This -- we obviously
2 have a disagreement on this point and I -- I think
3 you've preserved your argument for the record. Just
4 for the record, the remark that you just made about
5 not having a theory of prosecution, I believe that to
6 be incorrect and I believe I've advised each of you
7 on a number of theories that we are proceeding on in
8 this investigation.

9 So for the record, I -- we -- the
10 government's position is that you are not proceeding
11 in this deposition with no possible theory of
12 prosecution and no idea of what we're investigating.
13 But I think in your Defense Exhibit A, you've
14 preserved your objections on those grounds and I just
15 think that the deposition should proceed at the
16 moment.

17 DIRECT EXAMINATION

18 BY MR. McADAMS:

19 Q. Good morning, Mr. Wiley.

20 A. Morning.

21 Q. My name is John McAdams and I'm an
22 attorney for the government. I'm going to ask you
23 some questions. And you understand that you're
24 under oath now?

25 A. Yes.

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1 Q. Okay. And you have an obligation to tell
2 the truth?

3 A. Yes.

4 Q. Okay. Mr. Wiley, how old are you?

5 A. I'm just about 80.

6 Q. Just about 80 years old?

7 A. Yeah.

8 Q. Okay. And --

9 A. Four days short of it.

10 Q. Birthday this week?

11 A. Next week.

12 MR. McADAMS: Happy birthday in advance.

13 Q. Mr. Wiley, what is the current state of
14 your health?

15 A. Not too good I'm afraid.

16 Q. Do you know what your diagnosis is?

17 A. Yeah. Stage IV cancer.

18 Q. Stage IV cancer?

19 A. And other little things connected with it.

20 Q. Have you been given a prognosis by a
21 medical physician as to how long you're expected to
22 live?

23 A. Well, the Veterans Hospital doctor, I can
24 give you his name, the oncologist at the V.A.
25 Hospital in New Haven, he gave me --

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<p style="text-align: right;">Page 13</p> <p>1 MR. FLANDERS: I'm going to object to</p> <p>2 hearsay testimony.</p> <p>3 Q. Do you have an understanding as to how</p> <p>4 long you're expected to live?</p> <p>5 A. I was expected to live three months.</p> <p>6 Q. And when was that?</p> <p>7 A. That was a year ago.</p> <p>8 Q. So it's your understanding a year ago you</p> <p>9 were expected to live for three more months?</p> <p>10 A. Three more months, yes.</p> <p>11 Q. And do you have any idea what -- what your</p> <p>12 life expectancy is now?</p> <p>13 A. The good Lord knows. I don't.</p> <p>14 Q. Okay.</p> <p>15 A. No.</p> <p>16 Q. Now, Mr. Wiley, are you able to understand</p> <p>17 my questions?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Are you under any medications that</p> <p>20 affect your ability to understand?</p> <p>21 A. Not to my knowledge.</p> <p>22 Q. Okay. What type of medications do you</p> <p>23 take?</p> <p>24 A. Well, medications. Optivan, morphine,</p> <p>25 which I'm not taking yet, tramadol, Levsin.</p>	<p style="text-align: right;">Page 15</p> <p>1 A. No, when I -- when I was 20 -- 30 -- 20 --</p> <p>2 let's see. 28 years old I believe it was.</p> <p>3 Q. Okay. And you stopped working at that</p> <p>4 point?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. What type of work did you do?</p> <p>7 A. Well, I worked for the Town of West</p> <p>8 Hartford.</p> <p>9 Q. West Hartford, Connecticut?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. How much education do you have,</p> <p>12 Mr. Wiley?</p> <p>13 A. Well, two years of college.</p> <p>14 Q. Two years of college?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. I want to turn your attention now,</p> <p>17 Mr. Wiley. Have you ever met a man by the name of</p> <p>18 Raymour Radhakrishnan?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And do you see him in this room</p> <p>21 today?</p> <p>22 A. Yes, I do.</p> <p>23 MR. McADAMS: Okay. Let the record reflect</p> <p>24 that Mr. Radhakrishnan was identified by Mr. Wiley.</p> <p>25 Q. Could you tell us how you met</p>
<p style="text-align: right;">Page 14</p> <p>1 Q. And you --</p> <p>2 A. That's what I'm taking now.</p> <p>3 Q. Okay. And you indicated you -- you're</p> <p>4 subscribed -- prescribed morphine but you're not</p> <p>5 taking it?</p> <p>6 A. No.</p> <p>7 Q. Okay. Has anything affected your ability</p> <p>8 to understand what I'm asking you today?</p> <p>9 A. Not to my knowledge.</p> <p>10 Q. Okay. Mr. Wiley, how long has it been</p> <p>11 since you retired?</p> <p>12 A. 60 years.</p> <p>13 THE REPORTER: How many years?</p> <p>14 THE WITNESS: 60.</p> <p>15 Q. 60 years?</p> <p>16 A. Yes.</p> <p>17 Q. What -- when did you last work?</p> <p>18 A. I last worked part time at Avondale</p> <p>19 Boatyard in Avondale, Rhode Island, for two hours</p> <p>20 per week per -- two days per week, two hours.</p> <p>21 Q. When you indicated that you last worked 60</p> <p>22 years, do you mean you retired when you were 60?</p> <p>23 A. I was forced to. I had a stroke.</p> <p>24 Q. You had a stroke when you were 60 years</p> <p>25 old?</p>	<p style="text-align: right;">Page 16</p> <p>1 Mr. Radhakrishnan?</p> <p>2 A. Well, I met him actually through hospice.</p> <p>3 They said that a certain philanthropist in I guess</p> <p>4 it was Providence area, was helping out people on</p> <p>5 the -- on the way out so to speak.</p> <p>6 Q. When you say on the way out, you mean near</p> <p>7 the end of their lives?</p> <p>8 A. Yes.</p> <p>9 MR. PINE: Objection.</p> <p>10 MR. TRAINI: I'm going to object to the</p> <p>11 hearsay nature of this particular question.</p> <p>12 MR. McADAMS: I think this is just</p> <p>13 background at this point, but we'll -- we'll -- he</p> <p>14 can answer it, so I'm going to ask him to answer the</p> <p>15 question.</p> <p>16 MR. TRAINI: I understand that but just as</p> <p>17 a kind of a logistical matter, I don't -- I'm not</p> <p>18 trying to make this difficult for the witness and I</p> <p>19 don't want to continually interrupt you, so -- and I</p> <p>20 know ordinarily you wouldn't be able to do this in</p> <p>21 court, but unless you have some objection to it,</p> <p>22 maybe you will agree that we can object to lines of</p> <p>23 questioning if you're doing it on a continuous basis</p> <p>24 like this conversation about his conversation with</p> <p>25 hospice, for example. All those questions are</p>

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1 objectionable on hearsay grounds.

2 I just don't want to keep doing it on every
3 single question. We'll be here forever and it's
4 going to be a lot more difficult for the witness. Do
5 you have a problem with -- with handling the
6 objections that way?

7 MR. McADAMS: I don't have any problem with
8 that.

9 MR. VILKER: I prefer specific objections.

10 MR. McADAMS: Well, then we're going to ask
11 that you make a specific objection if you have one.
12 I'm going to ask -- I've asked him to answer the
13 question and your objection came after his answer so
14 --

15 BY MR. McADAMS:

16 Q. So when did you meet Mr. Raymour
17 Radhakrishnan?

18 A. Well, I met him -- he came to the house,
19 and he represented somebody, I didn't know the
20 gentleman's name at the time, but he came from --
21 hospice actually were the people that evidently
22 either they got ahold of him or he got ahold of
23 them. And they offered me a certain amount of money
24 to help me over the transition period. Now, what
25 the transition period would have been I don't really

1 MR. McADAMS: Well, I'm going to ask you to
2 answer that question.

3 THE WITNESS: What was it again now?

4 Q. What -- what did Mr. Radhakrishnan say to
5 you when he came to your house?

6 A. Well, he -- he said that he represented
7 this philanthropist in Providence area who was
8 giving out of the generosity of his heart I guess,
9 which I later found out different, a -- a certain
10 amount of money to help with the transition period.

11 Q. Okay. When you -- when you say that he
12 told you that a philanthropist in the Providence
13 area was giving out a certain amount of money to
14 help with the transition period, what did you
15 understand that to mean?

16 A. Well, a -- a -- a gift.

17 MR. TRAINI: Objection.

18 MR. McADAMS: The same objection?

19 MR. TRAINI: Yes.

20 MR. McADAMS: Okay. I'm going to ask you
21 to answer.

22 Q. So he -- could you repeat your answer?

23 A. Well, it was that it was money to help me
24 die on I guess or help me, you know, through the
25 parents or whoever -- well, I don't have any anyhow

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1 know. I mean I suppose it was the three years or
2 whatever that -- or as long as I kept living. It
3 was -- they gave it to me to --

4 Q. Okay.

5 A. -- help me out.

6 Q. I want to ask you to focus on when -- when
7 Mr. Raymour Radhakrishnan met you. You said he came
8 to your house?

9 A. Yes.

10 Q. Okay. And do you remember what time of
11 year that was approximately?

12 A. I think it was in early January.

13 Q. Okay. Of this -- this year, 2009?

14 A. Yes.

15 Q. Okay. And when he came to your house,
16 what did he say to you?

17 MR. TRAINI: Objection.

18 MR. PINE: Objection.

19 MR. McADAMS: What's the basis of that
20 objection?

21 MR. TRAINI: Hearsay.

22 MR. McADAMS: Well, it's a statement of a
23 party opponent.

24 MR. TRAINI: If this is a conspiracy case,
25 it's a Petrozziello objection.

1 -- just help settle up my debts or whatever you have
2 at the -- towards the end, funeral expenses or
3 whatever.

4 Q. So you understood this was a gift from a
5 philanthropist?

6 MR. MacFADYEN: Objection.

7 MR. TRAINI: Objection, leading.

8 MR. FLANDERS: Objection.

9 MR. PINE: Objection, leading.

10 MR. McADAMS: Well, it's developing of --

11 MR. TRAINI: Objection.

12 MR. McADAMS: I'm going to ask you to
13 answer the question.

14 Q. Did you understand this to be a gift from
15 a philanthropist?

16 MR. PINE: Objection.

17 MR. MacFADYEN: Objection.

18 MR. TRAINI: Objection.

19 MR. FLANDERS: Objection.

20 A. Yes, I did.

21 Q. Okay. Let me rephrase that. What did you
22 understand this money to be?

23 MR. MacFADYEN: Objection.

24 MR. FLANDERS: Objection.

25 MR. PINE: Objection.

8 (Pages 17 to 20)

<p style="text-align: right;">Page 21</p> <p>1 MR. TRAINI: Objection. Calls for hearsay.</p> <p>2 Q. What did you understand this money to be?</p> <p>3 A. Well, I just stated it. I thought it was</p> <p>4 for -- to help me out with my -- my expenses with</p> <p>5 burial expenses and things of that sort.</p> <p>6 Q. Okay. What, if anything, did Mr. Raymour</p> <p>7 (sic) say to you about a charitable program for the</p> <p>8 terminally ill?</p> <p>9 MR. TRAINI: Objection.</p> <p>10 A. He didn't say a word to me that I</p> <p>11 remember --</p> <p>12 Q. What did he --</p> <p>13 A. -- about a charitable...</p> <p>14 Q. Okay. What, if anything, did he tell you</p> <p>15 about what you were going to have to do in return</p> <p>16 for getting the money?</p> <p>17 MR. PINE: Objection.</p> <p>18 A. Nothing.</p> <p>19 Q. Nothing?</p> <p>20 A. It just -- he had me sign -- sign over all</p> <p>21 my ID. My driver's license he asked for, my --</p> <p>22 three types of ID.</p> <p>23 MR. MacFADYEN: Motion to strike.</p> <p>24 Nonresponsive.</p> <p>25 Q. Okay. Let -- let me ask you in a</p>	<p style="text-align: right;">Page 23</p> <p>1 later; is that correct?</p> <p>2 MR. FLANDERS: Objection.</p> <p>3 MR. MacFADYEN: Objection.</p> <p>4 A. Nine or ten days later.</p> <p>5 Q. Okay. So at some point --</p> <p>6 A. Or --</p> <p>7 Q. -- he returned to your house?</p> <p>8 MR. FLANDERS: Objection</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. And when he returned to your house,</p> <p>11 he -- did he bring some papers for you to sign?</p> <p>12 A. Yes.</p> <p>13 MR. MacFADYEN: Objection.</p> <p>14 Q. What kind of papers were they?</p> <p>15 A. Well, it was just an agreement that if I</p> <p>16 signed these, he would give me the money. So I</p> <p>17 signed them and that was it.</p> <p>18 Q. Okay. Did he --</p> <p>19 MR. MacFADYEN: Motion to strike.</p> <p>20 Nonresponsive.</p> <p>21 Q. Did you read the papers that he gave to</p> <p>22 you?</p> <p>23 A. Partially.</p> <p>24 Q. Okay. What did you understand them to</p> <p>25 say?</p>
<p style="text-align: right;">Page 22</p> <p>1 different way. Did Mr. Raymour (sic) say anything</p> <p>2 about what you would have to do in return for the</p> <p>3 money?</p> <p>4 MR. MacFADYEN: Objection</p> <p>5 MR. FLANDERS: Objection.</p> <p>6 MR. PINE: Objection. Leading.</p> <p>7 MR. TRAINI: Objection. Calls for hearsay.</p> <p>8 MR. McADAMS: You can answer the question.</p> <p>9 I'm going to repeat it. Your objection is noted.</p> <p>10 Q. What, if anything, did he say about what</p> <p>11 you needed to return -- do in return for the money?</p> <p>12 A. Well, he just said you had to sign some</p> <p>13 papers. He said that they'd been taken once before</p> <p>14 and that's why he wanted the ID, and all I had to do</p> <p>15 was sign some papers and he was going to match me up</p> <p>16 with somebody. I don't know who he was going to</p> <p>17 match me up with, what he was going to match me up</p> <p>18 with.</p> <p>19 So I said, "Okay. I'll" -- he --</p> <p>20 eventually, about ten days later, he -- nine I guess</p> <p>21 it was, he brought down some papers for me to sign</p> <p>22 and that was it. Then he paid me off in cash.</p> <p>23 MR. MacFADYEN: Motion to strike.</p> <p>24 Nonresponsive.</p> <p>25 Q. Okay. Mr. Wiley, he came back ten days</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I didn't understand them to say anything</p> <p>2 really truthfully.</p> <p>3 Q. Okay. And did Mr. Raymour Radhakrishnan</p> <p>4 explain them to you?</p> <p>5 A. Not really.</p> <p>6 Q. Okay. When you say not really, what do</p> <p>7 you mean?</p> <p>8 A. Well, he -- he said I just have to --</p> <p>9 MR. TRAINI: Objection.</p> <p>10 MR. PINE: Objection.</p> <p>11 A. -- match these up with somebody. I don't</p> <p>12 know what he meant by that.</p> <p>13 Q. Okay.</p> <p>14 MR. MacFADYEN: Motion to strike.</p> <p>15 Nonresponsive.</p> <p>16 Q. At this point I'm going to show you a</p> <p>17 document that's been marked as Government Exhibit 1,</p> <p>18 and underneath there's a notation that says, "Wiley</p> <p>19 9-30-09." And I'm going to ask you to look at this</p> <p>20 document, Mr. Wiley, and I'm going to turn to the</p> <p>21 last page. It's a three-page document. Do you see</p> <p>22 that?</p> <p>23 A. Right.</p> <p>24 Q. Do you see your -- is that your signature</p> <p>25 on there?</p>

<p style="text-align: right;">Page 25</p> <p>1 A. Could be.</p> <p>2 Q. Does it look like your signature?</p> <p>3 A. It looks pretty close to it but I don't</p> <p>4 think it's -- Wiley is spelled the same way as I</p> <p>5 usually spell it.</p> <p>6 Q. Okay.</p> <p>7 A. Although I never spell it the same any --</p> <p>8 any one time.</p> <p>9 Q. Now, this document, at the top of it, it</p> <p>10 says, "Agreement and Acknowledgement." Do you</p> <p>11 remember seeing this document before?</p> <p>12 MR. TRAINI: Objection. Time frame.</p> <p>13 Q. Before today?</p> <p>14 A. No. I never saw it before.</p> <p>15 Q. Okay. Now, in the first paragraph, it</p> <p>16 says, "This Agreement and Acknowledgement"--</p> <p>17 MR. TRAINI: Objection.</p> <p>18 MR. PINE: Objection.</p> <p>19 MR. TRAINI: Reading from the document.</p> <p>20 MR. PINE: It's not an exhibit.</p> <p>21 MR. McADAMS: It may be at a point in time</p> <p>22 that this document is in evidence. For now --</p> <p>23 MR. TRAINI: But it's not in evidence.</p> <p>24 MR. McADAMS: That's your objection.</p> <p>25 Understood. We'll -- all right.</p>	<p style="text-align: right;">Page 27</p> <p>1 paragraph that's numbered 2 in this exhibit, and it</p> <p>2 says, "In exchange for the" --</p> <p>3 MR. TRAINI: Objection.</p> <p>4 MR. PINE: Objection.</p> <p>5 Q. It says, "In exchange for the Co-Owner's</p> <p>6 agreement to become a joint tenant in the Account,</p> <p>7 the Funds Provider has paid the Co-Owner the sum of</p> <p>8 \$5,000." Okay. Did Mr. Radhakrishnan pay you</p> <p>9 \$5,000?</p> <p>10 MR. PINE: Objection.</p> <p>11 A. No.</p> <p>12 Q. Did he pay you any money?</p> <p>13 A. Yes. He paid me three.</p> <p>14 Q. 3,000 or --</p> <p>15 A. 3,000.</p> <p>16 Q. Okay. And when did he pay you \$3,000?</p> <p>17 A. Well, he paid me right after he -- I</p> <p>18 signed the things and the -- the -- the slips that</p> <p>19 he had. I don't know whether they were that --</p> <p>20 those papers or -- or other papers for sure, but I</p> <p>21 don't think I -- I never saw that I don't believe</p> <p>22 before. And he never delivered me \$5,000. Like I</p> <p>23 say, he delivered three in cash.</p> <p>24 Q. So he paid you in cash?</p> <p>25 A. Yes. Now I figured out the reason finally</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. This document, Mr. Wiley, in the first</p> <p>2 paragraph it says, "This Agreement and</p> <p>3 Acknowledgement is made and entered into as of the</p> <p>4 22nd day of January 2009, by and between Paula</p> <p>5 Caramadre, an individual with an address of 90</p> <p>6 Beechwood Drive, Cranston, Rhode Island, 02921,"</p> <p>7 and then it says in parentheses, "(Funds Provider),</p> <p>8 and Richard Wiley, an individual with an address of</p> <p>9 388 Shore Road." And then it says in parentheses,</p> <p>10 "(Co-Owner)." Now, have -- when -- had you ever</p> <p>11 seen or heard of the name Paula Caramadre before?</p> <p>12 MR. PINE: Objection.</p> <p>13 A. Never.</p> <p>14 Q. Okay. When you signed documents that</p> <p>15 Mr. Radhakrishnan provided to you, did they have</p> <p>16 other peoples' names in them?</p> <p>17 MR. PINE: Objection.</p> <p>18 A. No, I don't remember. I don't think so.</p> <p>19 Q. You don't think so. Okay. Thank you. Is</p> <p>20 that your handwriting?</p> <p>21 A. Where? No.</p> <p>22 Q. Up here in the first paragraph?</p> <p>23 A. No.</p> <p>24 Q. Mr. Wiley, I'm going to point your</p> <p>25 attention to the second paragraph, excuse me, the</p>	<p style="text-align: right;">Page 28</p> <p>1 through my dumb skull.</p> <p>2 MR. MacFADYEN: Motion to strike.</p> <p>3 MR. PINE: Motion to strike.</p> <p>4 Q. When you got the \$3,000 from</p> <p>5 Mr. Radhakrishnan, did he tell you there would be</p> <p>6 any additional money that you would be paid?</p> <p>7 MR. TRAINI: Objection.</p> <p>8 MR. PINE: Objection.</p> <p>9 A. No. No, he didn't say there would be any</p> <p>10 additional money paid to me, no.</p> <p>11 Q. Did he -- did you have any additional</p> <p>12 conversations with him at that time?</p> <p>13 A. No. He paid me and he left.</p> <p>14 Q. Did he say anything to you when he left?</p> <p>15 MR. PINE: Objection.</p> <p>16 A. Sure. "I'll never see you again</p> <p>17 probably."</p> <p>18 Q. Okay. How long did you look at the papers</p> <p>19 before you signed them?</p> <p>20 A. That I couldn't tell you. Not -- not very</p> <p>21 long.</p> <p>22 Q. Did you understand what --</p> <p>23 A. He --</p> <p>24 Q. -- they said?</p> <p>25 A. -- handed them to me like this, and he --</p>

<p style="text-align: right;">Page 29</p> <p>1 "Sign here and sign here," and that was it.</p> <p>2 MR. MacFADYEN: Motion to strike.</p> <p>3 Nonresponsive.</p> <p>4 Q. What did he say to you while he asked you</p> <p>5 to sign the papers?</p> <p>6 MR. PINE: Objection.</p> <p>7 MR. TRAINI: Objection.</p> <p>8 A. That I can't remember, if anything.</p> <p>9 Q. Okay. What, if anything, did he say these</p> <p>10 documents were for?</p> <p>11 MR. PINE: Objection.</p> <p>12 MR. TRAINI: Objection.</p> <p>13 MR. MacFADYEN: Objection.</p> <p>14 A. He didn't say any -- any specific thing,</p> <p>15 just that he would match me up with somebody and</p> <p>16 that was it.</p> <p>17 Q. Now, this document, Government Exhibit 1,</p> <p>18 says, "Brokerage Account" on it. Did</p> <p>19 Mr. Radhakrishnan say anything to you about a</p> <p>20 brokerage account?</p> <p>21 A. No.</p> <p>22 MR. TRAINI: Objection.</p> <p>23 A. No.</p> <p>24 Q. Did you have any knowledge that a</p> <p>25 brokerage account in your name would be opened?</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Okay. Now, above -- above the line where</p> <p>2 your signature appears, whether you put it there or</p> <p>3 not, it's printed Richard Wiley. Did you -- is that</p> <p>4 your handwriting?</p> <p>5 A. No.</p> <p>6 Q. Okay. What about the date that's marked,</p> <p>7 3/15/09, is that your handwriting?</p> <p>8 A. I couldn't say for sure.</p> <p>9 Q. When you -- do you recall -- let me</p> <p>10 rephrase that question. I'm going to point your</p> <p>11 attention to the other box here that says, "Paula</p> <p>12 Caramadre," and there's a signature there. Do you</p> <p>13 recall seeing that name on any papers that you</p> <p>14 signed?</p> <p>15 A. No, I don't.</p> <p>16 Q. Okay. And down on the bottom here,</p> <p>17 right-hand corner, there's a signature and it says</p> <p>18 "Notary Public." Do you see that?</p> <p>19 A. I see it.</p> <p>20 Q. Okay. When you signed papers with</p> <p>21 Mr. Radhakrishnan, was there a notary public there?</p> <p>22 A. No.</p> <p>23 Q. Nobody -- did anybody notarize your name?</p> <p>24 A. Not to my knowledge.</p> <p>25 Q. And now I think you told us earlier that</p>
<p style="text-align: right;">Page 30</p> <p>1 A. No.</p> <p>2 Q. Did you give your consent to open any type</p> <p>3 of account?</p> <p>4 A. No.</p> <p>5 Q. Did you have any knowledge of opening an</p> <p>6 account with Paula Caramadre?</p> <p>7 A. No.</p> <p>8 Q. Did you give your consent to</p> <p>9 Mr. Radhakrishnan to open accounts in your name?</p> <p>10 A. No.</p> <p>11 Q. Okay. Mr. Wiley, I want to show you</p> <p>12 another document and this one has been marked</p> <p>13 Government Exhibit 2, Wiley 9-30-09. Can you take a</p> <p>14 look at that document, sir? And I'm going to point</p> <p>15 you to the -- where it says, "Co-Owner." Is that</p> <p>16 your name?</p> <p>17 A. That's my name.</p> <p>18 Q. Okay. Is that your signature under there?</p> <p>19 A. No.</p> <p>20 Q. Are you sure it's not your signature?</p> <p>21 A. I'm almost positive it's not my signature.</p> <p>22 Q. What makes you think it's not your</p> <p>23 signature?</p> <p>24 A. The Gay. Richard Gay Wiley's -- I</p> <p>25 usually sign it Richard G. Wiley.</p>	<p style="text-align: right;">Page 32</p> <p>1 it was early January or sometime in January when you</p> <p>2 met Mr. --</p> <p>3 A. Well, there was a little snow on the</p> <p>4 ground so it probably was early January.</p> <p>5 Q. Okay. And then -- then when he came back</p> <p>6 with papers, it was a week or so later?</p> <p>7 MR. TRAINI: Objection.</p> <p>8 MR. PINE: Objection. Leading.</p> <p>9 Q. How long was it until he came back with</p> <p>10 the papers?</p> <p>11 A. Nine days.</p> <p>12 Q. Okay.</p> <p>13 A. Approximately nine days.</p> <p>14 Q. Okay. Did he come back at any point in</p> <p>15 time after that second visit?</p> <p>16 A. I think he came back once but I'm not</p> <p>17 sure.</p> <p>18 Q. Was there a point in time when he came</p> <p>19 back with an attorney?</p> <p>20 A. No.</p> <p>21 Q. Mr. Flanders?</p> <p>22 A. He came back eventually when -- well, it</p> <p>23 was when -- when I first -- first met Flanders, he</p> <p>24 came to my house. She came to my house, and they</p> <p>25 interviewed me.</p>

<p style="text-align: right;">Page 33</p> <p>1 Q. So I guess what I'm asking you is other 2 than the time when Mr. Flanders came to your house 3 to interview you and the two times that you've 4 described to us in approximately January when 5 Mr. Radhakrishnan visited you, were there any other 6 visits that he made to you? 7 A. Not that I can remember. 8 Q. Okay. This document, Government's Exhibit 9 2, says at the top of it -- 10 MR. PINE: Objection. He hasn't 11 authenticated it as his own signature. 12 MR. McADAMS: Your objection is as to 13 whether this is in evidence? 14 MR. PINE: Yes. 15 MR. TRAINI: It isn't in evidence. 16 MR. McADAMS: Assuming for argument's sake 17 that it were in evidence, is your objection basically 18 the fact that I'm reading from a document that's not 19 in evidence? Is that what your objection is? 20 MR. PINE: He hasn't identified it 21 properly. 22 MR. McADAMS: Okay. It could come in 23 another way, so I'm just trying to understand exactly 24 what your objection is. 25 MR. TRAINI: Well, the objection is that</p>	<p style="text-align: right;">Page 35</p> <p>1 in this. 2 Q. Okay. Did you ever have a trading account 3 with TradeKing? 4 A. No. 5 Q. Did you ever consent to have somebody, 6 Mr. Radhakrishnan or anyone else, open an account in 7 your name at TradeKing? 8 A. No. 9 Q. Do you own a computer, Mr. Wiley? 10 A. No. I own nothing in the electronic line. 11 MR. PINE: I'm sorry, I didn't hear that. 12 MR. FLANDERS: I can't hear the witness. 13 Q. Can you -- 14 A. I own nothing in the electronic line. 15 Q. Did you ever go on a computer and open an 16 account? 17 A. I didn't. A car dealer did. Not a car 18 dealer but my -- a man who works on my cars did at 19 Dunn's Corners. 20 Q. Did that have anything to do with the 21 financial account? 22 A. No. No, heavens no. It was for a used 23 windshield wiper motor for an old Porsche. 24 Q. So you're talking about a -- your car 25 dealer buying a part for --</p>
<p style="text-align: right;">Page 34</p> <p>1 you're reading from a document -- 2 MR. McADAMS: That's not -- 3 MR. TRAINI: -- that's not in evidence and 4 hasn't been authenticated so -- 5 MR. McADAMS: Okay. 6 MR. TRAINI: -- that's the objection. 7 MR. McADAMS: Understood. 8 Q. The document says at the top, "Limited 9 Trading Authorization." And do you recall ever 10 giving your authorization to Mr. Radhakrishnan to 11 engage in trading activity? 12 A. No. 13 Q. Do you recall ever giving your 14 authorization to Paula Caramadre to engage in 15 trading activity? 16 A. No. No. 17 Q. Now, this document also says that it's -- 18 the "Signatures on this page must be notarized. 19 Mail original (fax copies will not be accepted) to: 20 TradeKing 5455 North Federal Highway, Suite E, Boca 21 Raton, Florida." 22 MR. TRAINI: Objection. 23 Q. Are you familiar with any company called 24 TradeKing? 25 A. Never heard of them before I got involved</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Yeah. I assumed that that was what it 2 was. A gentleman called me up -- 3 Q. Let -- let me stop you there and ask you a 4 question. When is the first time you heard of a 5 company called TradeKing? 6 MR. FLANDERS: Objection. 7 A. Well, I got a -- a telephone call from 8 somebody and they asked me if I -- 9 Q. Without telling us what they said to you, 10 you indicated that you got a telephone call from 11 somebody at TradeKing? 12 A. I believe it was TradeKing. 13 MR. MacFADYEN: Objection. 14 MR. TRAINI: Objection. 15 Q. What was the nature of that phone call, 16 without telling us what anybody said. 17 MR. TRAINI: Objection. Still calls for 18 hearsay. 19 A. They asked -- 20 MR. PINE: Move to strike. 21 A. Well, they asked if I had any business 22 with this Paula Carmad -- Carmadre (sic), and I said 23 I'd never even heard of the woman before. 24 MR. PINE: Move to strike. 25 MR. McADAMS: Do you need a tissue?</p>

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<p style="text-align: right;">Page 37</p> <p>1 THE WITNESS: I'll get it if I need it. 2 I've got some. 3 MR. McADAMS: We have some tissues here. 4 There you go. 5 THE WITNESS: Thanks. 6 Q. Mr. Wiley, do you know a woman by the name 7 of Paula Caramadre? 8 A. No. I said I never heard of her before. 9 Q. What about a person by the name of Joseph 10 Caramadre? 11 A. No. I never heard of him. 12 Q. Okay. So I take it if you never heard of 13 him, then you never met him? 14 A. No. 15 MR. TRAINI: Objection. 16 MR. PINE: Objection. 17 Q. Okay. Did Mr. Raymour say anything to you 18 about them? 19 MR. TRAINI: Objection. 20 MR. PINE: Objection. 21 MR. FLANDERS: Objection. 22 MR. MacFADYEN: Objection. 23 A. No, just that there was a philanthropist. 24 Q. And you don't know what the 25 philanthropist's name was?</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. Are you aware of an account at TradeKing 2 in your name that had over \$300,000 in it? 3 MR. PINE: Objection. 4 MR. TRAINI: Objection. 5 A. No. 6 MR. McADAMS: What's that objection for? 7 MR. TRAINI: Leading. 8 MR. PINE: Leading. 9 Q. What knowledge, if any, do you have of an 10 account opened at TradeKing? 11 A. None until all this business came up. 12 Q. Did you ever receive copies of statements 13 from TradeKing accounts? 14 A. No. I don't even know who TradeKing is. 15 Q. I'm going to show you a document that's 16 marked Government Exhibit 3. Can you take a look at 17 that? Do you see that? 18 A. Yup. 19 Q. Okay. And do you see the address line? 20 A. Yes. 21 Q. Can you read that? 22 A. Richard G. Wiley, joint something or 23 other, with Paula M. Caramadre. 24 Q. Okay. Did you ever receive any types of 25 financial statements from TradeKing?</p>
<p style="text-align: right;">Page 38</p> <p>1 MR. TRAINI: Objection. 2 A. I didn't know his name. 3 Q. Did you know what the philanthropist's 4 name was? 5 A. No, I did not. 6 MR. FLANDERS: Objection. 7 MR. TRAINI: Objection. 8 MR. MacFADYEN: Objection. 9 Q. Okay. Did Mr. Raymour tell you what his 10 name was? 11 MR. TRAINI: Objection. 12 A. No, he did not. 13 Q. Are you aware that a -- an account was 14 opened at TradeKing in your name, in the -- 15 A. No. 16 Q. No. Are you aware that it was a -- that 17 there was a joint account opened in the name of 18 yourself and a woman named Paula Caramadre? 19 MR. FLANDERS: Objection. 20 MacFADYEN: Objection. 21 MR. TRAINI: Objection. 22 MR. PINE: Objection. 23 A. No. I was not. 24 MR. TRAINI: It's leading and asked and 25 answered.</p>	<p style="text-align: right;">Page 40</p> <p>1 A. No. 2 Q. Okay. Do you know what is at 1000 Chapel 3 View Boulevard in Cranston, Rhode Island? 4 A. No. 5 Q. Have you ever lived there? 6 A. Never been there. Haven't been to 7 Cranston. 8 Q. What knowledge, if any, do you have of an 9 account in your name at Fidelity Investments? 10 A. Never heard of them. 11 Q. Fidelity Investments, have you ever heard 12 of them? 13 A. Never. 14 Q. Did you ever open an account with them? 15 A. No. 16 Q. Did you ever give consent to anyone to 17 open an account in your name there? 18 A. No. 19 Q. Mr. Wiley, I want to show you a document 20 that's marked as Government Exhibit 4. Can you take 21 a look at that for me, please? 22 A. Well -- 23 Q. Do you recognize that? 24 A. No, I don't really. "... TradeKing spoke 25 to you about a brokerage account opened in your</p>

<p style="text-align: right;">Page 41</p> <p>1 name." (Witness reading document.) Well, I never 2 even talked to TradeKing. 3 Q. Well, I believe you said earlier that you 4 talked to them on the phone; is that correct? 5 MR. PINE: Objection. 6 MR. TRAINI: Objection. 7 MR. MacFADYEN: Objection. 8 MR. FLANDERS: Objection. 9 Q. Okay. 10 A. The man had called me (unintelligible). 11 Q. Do you recall receiving anything in the 12 mail from TradeKing subsequent to your phone call? 13 A. Oh, I received a bunch of -- oh, I don't 14 know what the hell I -- now I'm getting confused. 15 Q. Did you receive any papers in the mail 16 from them, from TradeKing? 17 MR. TRAINI: Objection. 18 A. I don't think so. 19 Q. Okay. I want to -- this is part of the 20 same exhibit, okay, that you just looked at, Exhibit 21 4. 22 MR. PINE: Objection. 23 MR. TRAINI: Objection. 24 MR. MacFADYEN: Objection. 25 MR. FLANDERS: Objection.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. Okay. Is that your signature? 2 A. That's not my signature. Somebody printed 3 my name. 4 Q. Okay. Where it's printed here underneath, 5 is that your signature? 6 A. I don't -- the Richard is definitely not, 7 but -- and -- and Wiley is not. The only thing that 8 -- anything like any of my signatures is the G. 9 Q. Okay. Well, do you recall -- do you know 10 Special Agent Pamela McDaid from the FBI? 11 A. I do. 12 Q. Okay. And do you recall meeting with her 13 regarding some paperwork from TradeKing? 14 MR. TRAINI: Objection. 15 MR. PINE: Objection. 16 THE WITNESS: Is that where it was from? 17 Q. Do you recall meeting with her regarding 18 any paperwork from TradeKing? 19 MR. PINE: Objection. 20 MR. TRAINI: Objection. 21 A. Yes. She came down and helped me fill out 22 some papers because I didn't know -- they had a lot 23 of things asking me if I had electronic stuff and I 24 didn't want to sign anything that was going to be 25 wrong because I don't know a damn thing about</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. The second page, do you recognize that 2 part of it? 3 MR. PINE: Objection. 4 A. No. 5 Q. Okay. That's the second page, and I'm 6 going to turn -- 7 A. Oh, all right. Now I -- now I'm getting 8 familiar with it. That -- 9 Q. Why don't you look at it again and see if 10 you recognize it. 11 MR. FLANDERS: What are you showing the 12 witness? 13 MR. McADAMS: This is Government Exhibit 4. 14 MR. FLANDERS: What part? 15 MR. McADAMS: Second page. 16 THE WITNESS: This is where I signed 26 17 different things? 18 Q. Well, do you recognize it? Do you know 19 what it is? 20 A. No, I don't really. 21 MR. TRAINI: Objection. 22 Q. Okay. Let me turn -- let me ask you this. 23 I'm going to turn to page 16. At the bottom of it, 24 it says 16 of 16. 25 A. Now I recognize it.</p>	<p style="text-align: right;">Page 44</p> <p>1 electronics and I -- 2 MR. MacFADYEN: Move to strike. 3 Nonresponsive. 4 MR. FLANDERS: I can't hear the witness. 5 Can we have that question read back, please? It was 6 very hard to hear Mr. Wiley. 7 MR. McADAMS: Hold on, Mr. Wiley, the court 8 reporter is going to read your answer back. 9 (Whereupon, the last answer was read by the 10 reporter.) 11 MR. TRAINI: In case you didn't hear it, 12 there was a motion to strike that as nonresponsive. 13 MR. McADAMS: Okay. 14 Q. Do you recall meeting with Special Agent 15 McDaid regarding paperwork from TradeKing? 16 MR. TRAINI: Objection. Asked and 17 answered. 18 MR. PINE: Objection, the same. 19 MR. McADAMS: Well, you said it was 20 nonresponsive so I'm asking. 21 A. Yes. 22 Q. Okay. Now, is Government Exhibit 4 the 23 paperwork that you were referring to when you met 24 with prof -- with Special Agent McDaid? 25 MR. PINE: Objection.</p>

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<p style="text-align: right;">Page 45</p> <p>1 MR. TRAINI: Objection.</p> <p>2 A. Yes, I believe it is.</p> <p>3 Q. Could you explain what happened when you</p> <p>4 met with Special Agent McDaid and those paper --</p> <p>5 those papers were completed?</p> <p>6 MR. TRAINI: Objection. Calls for hearsay.</p> <p>7 A. I mailed them back to the person who sent</p> <p>8 them to me and wanted me to -- I sent them back to</p> <p>9 -- I don't know whether it was TradeKing or who it</p> <p>10 was so I sent them back.</p> <p>11 Q. Did you actually write the answers on the</p> <p>12 papers?</p> <p>13 A. Yes.</p> <p>14 Q. Did you write them or did prof -- Special</p> <p>15 Agent McDaid?</p> <p>16 MR. PINE: Objection.</p> <p>17 MR. TRAINI: Objection.</p> <p>18 MR. MacFADYEN: Objection.</p> <p>19 MR. FLANDERS: Objection.</p> <p>20 A. I wrote them in.</p> <p>21 Q. You wrote the answers. Okay. Did you</p> <p>22 read the questions?</p> <p>23 A. I read them with her so that I would</p> <p>24 understand them because some of them involved</p> <p>25 electronic stuff that I didn't know anything about.</p>	<p style="text-align: right;">Page 47</p> <p>1 Q. Mr. --</p> <p>2 A. I mean the fire department.</p> <p>3 Q. And who is Mr. Sayles?</p> <p>4 A. He's the chief of the fire department.</p> <p>5 Q. Okay. And how do you know him?</p> <p>6 A. Through the fire department.</p> <p>7 Q. Okay. And where did that meeting happen?</p> <p>8 A. At my house at 388 Shore Road.</p> <p>9 Q. Okay. And was that meeting recorded?</p> <p>10 A. Yes, it was.</p> <p>11 Q. Okay. At whose direction was it recorded?</p> <p>12 A. The government's I believe.</p> <p>13 Q. Did you say the government?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. And by that do you mean the FBI?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And so you knew that it was being</p> <p>18 recorded at that time?</p> <p>19 MR. MacFADYEN: Leading.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. What, if anything, did</p> <p>22 Mr. Radhakrishnan say to you at that meeting?</p> <p>23 MR. PINE: Objection.</p> <p>24 MR. TRAINI: Objection.</p> <p>25 A. I cannot remember. It -- it -- people</p>
<p style="text-align: right;">Page 46</p> <p>1 Like I say, I didn't want to write down something</p> <p>2 that was wrong.</p> <p>3 MR. TRAINI: Motion to strike.</p> <p>4 Nonresponsive.</p> <p>5 Q. Are the answers that are on that paper</p> <p>6 your answers?</p> <p>7 MR. PINE: Objection.</p> <p>8 A. Yes.</p> <p>9 Q. Did Special Agent McDaid tell you what to</p> <p>10 write on that document?</p> <p>11 A. No.</p> <p>12 Q. Mr. Wiley, at some point did</p> <p>13 Mr. Radhakrishnan come back to your house with</p> <p>14 Mr. Flanders?</p> <p>15 A. I said he came back once.</p> <p>16 Q. Do you recall when the -- when that was?</p> <p>17 A. That was -- I'm not sure of the date but</p> <p>18 it was, I would say, late -- late in the summer.</p> <p>19 Q. In the summertime?</p> <p>20 A. Or fall.</p> <p>21 Q. Okay. And when you had that meeting, who</p> <p>22 else was there besides Mr. Flanders and</p> <p>23 Mr. Radhakrishnan?</p> <p>24 A. There was Chief David Sayles of the</p> <p>25 Westerly Police Department.</p>	<p style="text-align: right;">Page 48</p> <p>1 were talking back and forth. I don't remember.</p> <p>2 Q. Okay. Do you remember anything about the</p> <p>3 meeting?</p> <p>4 A. Yes.</p> <p>5 Q. What do you remember?</p> <p>6 A. Well, I remember that -- when they wired</p> <p>7 -- wired Chief Sayles up.</p> <p>8 Q. You remember that the FBI wired Chief</p> <p>9 Sayles up?</p> <p>10 A. Yes.</p> <p>11 MR. TRAINI: Objection. Leading.</p> <p>12 MR. McADAMS: I'm just trying to clarify if</p> <p>13 that's what he said.</p> <p>14 MR. TRAINI: It's still an objection.</p> <p>15 Q. What else do you remember?</p> <p>16 A. Well, they stayed maybe about an hour, and</p> <p>17 I can't remember any one specific thing about it.</p> <p>18 Q. Was there any discussion about any</p> <p>19 payments to you?</p> <p>20 MR. PINE: Objection.</p> <p>21 MR. TRAINI: Objection.</p> <p>22 A. No.</p> <p>23 Q. After that meeting, did you receive any</p> <p>24 correspondence from Mr. Radhakrishnan?</p> <p>25 A. I can't remember.</p>

<p style="text-align: right;">Page 49</p> <p>1 Q. Do you remember if anything was sent to</p> <p>2 you?</p> <p>3 A. No. I don't believe anything was sent to</p> <p>4 me that would -- would have been from</p> <p>5 Mr. Radhakrishnan.</p> <p>6 Q. All right. So you didn't receive anything</p> <p>7 from him after that?</p> <p>8 A. No. I --</p> <p>9 Q. Did -- after the \$3,000 that you received</p> <p>10 from Mr. Radhakrishnan back in January, did you ever</p> <p>11 receive any additional monies from him?</p> <p>12 A. No, I didn't.</p> <p>13 MR. TRAINI: Objection.</p> <p>14 MR. McADAMS: What's the basis of that</p> <p>15 objection?</p> <p>16 MR. TRAINI: You asked that about 30</p> <p>17 questions ago and he answered it.</p> <p>18 Q. Okay. At -- at any point after you met</p> <p>19 with Mr. Flanders and Mr. Radhakrishnan, did you</p> <p>20 receive additional money?</p> <p>21 A. No, I did not.</p> <p>22 Q. Was there any discussion about the \$5,000</p> <p>23 that the Exhibit 1 indicated you were paid?</p> <p>24 MR. PINE: Objection.</p> <p>25 MR. TRAINI: Objection.</p>	<p style="text-align: right;">Page 51</p> <p>1 THE REPORTER: I'm sorry. I'm sorry, "I</p> <p>2 thought he -- I don't think he offered anything to</p> <p>3 Mr. Sayles," I think he what?</p> <p>4 A. Offered money through hospice to</p> <p>5 Mr. Sayles because they were the ones that he --</p> <p>6 said something about Mr. Sayles. They held 3,000 --</p> <p>7 I mean they held \$1500 aside for Mr. Sayles.</p> <p>8 Q. What, if anything --</p> <p>9 MR. TRAINI: Motion to strike.</p> <p>10 Q. What, if anything, did Mr. Radhakrishnan</p> <p>11 say to you about paying -- deferring some of the</p> <p>12 payment to you to a later time?</p> <p>13 MR. PINE: Objection.</p> <p>14 MR. TRAINI: Objection.</p> <p>15 MR. MacFADYEN: Objection.</p> <p>16 A. Didn't say a word.</p> <p>17 Q. Okay. I want to show you a document</p> <p>18 that's been marked as Government's Exhibit No. 7,</p> <p>19 okay? And can you see the top of it, who it's</p> <p>20 addressed to?</p> <p>21 A. Addressed to me.</p> <p>22 Q. Okay. And I'm going to turn to the second</p> <p>23 page. Do you -- it's a two-page letter. Do you</p> <p>24 recall receiving this letter?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 50</p> <p>1 A. Well, I objected because I never received</p> <p>2 it. I didn't -- he never gave me \$5,000.</p> <p>3 MR. TRAINI: Motion to strike.</p> <p>4 Nonresponsive.</p> <p>5 Q. Did you have a conversation with</p> <p>6 Mr. Radhakrishnan about being paid \$3,000 versus</p> <p>7 \$5,000?</p> <p>8 MR. TRAINI: Objection.</p> <p>9 MR. PINE: Objection.</p> <p>10 MR. TRAINI: Leading. Calls for hearsay.</p> <p>11 A. The \$3,000 was it, period. They never</p> <p>12 offered any more. They -- they never offered any to</p> <p>13 Mr. Sayles or anything else.</p> <p>14 Q. Did you ever have an agreement with</p> <p>15 Mr. Radhakrishnan to defer some of the payment that</p> <p>16 he was going to make to you in January to a later</p> <p>17 point in time and have money paid to Mr. Sayles?</p> <p>18 MR. PINE: Objection.</p> <p>19 MR. TRAINI: Objection.</p> <p>20 MR. MacFADYEN: Objection.</p> <p>21 MR. TRAINI: Leading.</p> <p>22 Q. Well, I -- I objected but now</p> <p>23 Mr. Radhakrishnan he -- he I don't think offered me</p> <p>24 anything to -- for Mr. Sayles. I think he thought</p> <p>25 that over somebody from hospice --</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Okay.</p> <p>2 A. Never saw it before. First time I've seen</p> <p>3 it.</p> <p>4 Q. At the bottom of the second page, there's</p> <p>5 a photocopy of a check made payable to Richard</p> <p>6 Wiley?</p> <p>7 MR. TRAINI: Objection.</p> <p>8 A. I never saw that.</p> <p>9 Q. Did you ever receive a check for \$2,000?</p> <p>10 A. No.</p> <p>11 Q. Mr. Wiley, what, if anything, did you have</p> <p>12 as an understanding of your obligations, what you</p> <p>13 had to do in return for the money that you were</p> <p>14 being given by Mr. Radhakrishnan?</p> <p>15 MR. TRAINI: Objection.</p> <p>16 A. Die. That's all, just die. It would -- I</p> <p>17 would die.</p> <p>18 Q. And then what would happen?</p> <p>19 MR. PINE. I'm sorry, I didn't hear that.</p> <p>20 A. Die. I -- I believe that they were</p> <p>21 waiting for me to die so as soon as I croaked, they</p> <p>22 had made some money off of me.</p> <p>23 MR. TRAINI: Move to strike.</p> <p>24 Q. What did you understand the purpose of the</p> <p>25 money that was given to you was for?</p>

<p style="text-align: right;">Page 53</p> <p>1 MR. TRAINI: Objection.</p> <p>2 A. To help -- I stated once before to help</p> <p>3 when I needed money for expenses to die with and to</p> <p>4 help settle maybe a -- bills that I had.</p> <p>5 Q. At the time that you signed the documents</p> <p>6 that Mr. Radhakrishnan gave you, did you have any</p> <p>7 knowledge that other people would make money off of</p> <p>8 that?</p> <p>9 MR. TRAINI: Objection.</p> <p>10 MR. PINE: Objection.</p> <p>11 MR. MacFADYEN: Objection.</p> <p>12 A. No.</p> <p>13 MR. McADAMS: I have no other questions at</p> <p>14 this time. So, Mr. Wiley, I'm done asking you</p> <p>15 questions and the other attorneys are going to be</p> <p>16 able to ask you questions. Do we want to -- does</p> <p>17 anybody need to take a break?</p> <p>18 MR. PINE: Does he need a break?</p> <p>19 MR. McADAMS: I want to make sure how</p> <p>20 you're feeling.</p> <p>21 THE WITNESS: Well, I'm feeling --</p> <p>22 MR. McADAMS: Do you need the bathroom or</p> <p>23 anything like that?</p> <p>24 THE WITNESS: Not yet, no.</p> <p>25 MR. McADAMS: Do you want a drink of water?</p>	<p style="text-align: right;">Page 55</p> <p>1 Hospital in West Haven. If I can get the exact date</p> <p>2 for you --</p> <p>3 Q. Approximately. Do you have a</p> <p>4 recollection?</p> <p>5 A. Well, that was about a year ago.</p> <p>6 Q. About a year ago?</p> <p>7 A. A year, a year and three months.</p> <p>8 Q. Okay. Prior to that, what was your health</p> <p>9 like prior to a year and three months ago?</p> <p>10 A. Average.</p> <p>11 Q. Okay. Did you have any serious illnesses?</p> <p>12 A. Well, I've busted up everything on my</p> <p>13 left-hand side. Hip. Not hip. What's the other --</p> <p>14 THE REPORTER: I'm sorry, I can't hear you.</p> <p>15 A. The hip I've broken, my leg has been</p> <p>16 broken. Everything on my left-hand side and when I</p> <p>17 was twenty -- shortly after I got out of the Army,</p> <p>18 maybe three years -- it would have been '53, about</p> <p>19 '55, '54, '55 -- I had a stroke, a massive stroke.</p> <p>20 Q. Okay. And how old were you when you had</p> <p>21 the stroke? You were in your twenties did you say?</p> <p>22 A. Twenties. That's why -- that's why I said</p> <p>23 I quit. I was out what, 60 years.</p> <p>24 Q. Right. You did not work for the past 60</p> <p>25 years --</p>
<p style="text-align: right;">Page 54</p> <p>1 THE WITNESS: I'm okay for the time being.</p> <p>2 MR. McADAMS: Okay. Just make sure you</p> <p>3 tell us, okay, if you're feeling anything like that.</p> <p>4 THE VIDEOGRAPHER: Off the record for a</p> <p>5 second. The time is 10:05. Off the record.</p> <p>6 (OFF THE RECORD)</p> <p>7 THE VIDEOGRAPHER: The time is 10:08. We</p> <p>8 are back on the record.</p> <p>9 CROSS-EXAMINATION</p> <p>10 BY MR. PINE:</p> <p>11 Q. Good morning, Mr. Wiley.</p> <p>12 A. Good morning.</p> <p>13 Q. My name is Jeffrey Pine. I am an</p> <p>14 attorney. I represent Raymour Radhakrishnan. I'm</p> <p>15 going to ask you some questions. If you don't</p> <p>16 understand a question that I ask, please let me know</p> <p>17 and I'll rephrase it. Okay?</p> <p>18 A. Okay.</p> <p>19 Q. You indicated that you're at Stage IV</p> <p>20 cancer, correct?</p> <p>21 A. Right.</p> <p>22 Q. And when were you first diagnosed with</p> <p>23 cancer?</p> <p>24 A. I was first diagnosed -- let's see if I've</p> <p>25 got the exact date in here in -- well, at the V.A.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. 60 years.</p> <p>2 Q. -- or so? And did you have a military</p> <p>3 background?</p> <p>4 A. I had a military background.</p> <p>5 Q. And you got discharged from the Army at</p> <p>6 some point?</p> <p>7 A. Yeah.</p> <p>8 Q. And what did you do for income after you</p> <p>9 had the stroke and recovered from the stroke?</p> <p>10 A. I lived off my parents I'm sorry to say.</p> <p>11 Q. Okay. Did you receive any --</p> <p>12 A. But I did do some menial part-time work.</p> <p>13 Q. Right.</p> <p>14 A. Mow lawns, mow a few lawns here and there.</p> <p>15 And then I worked two hours a day in the Avondale</p> <p>16 Boatyard running a little store they had there. Not</p> <p>17 much of a job.</p> <p>18 Q. Yeah. I think you said a couple of days a</p> <p>19 week, a couple of hours a day?</p> <p>20 A. A couple, yeah.</p> <p>21 Q. Was that after you had the stroke that you</p> <p>22 were able to do that?</p> <p>23 A. Yeah. It wasn't really much of a job. It</p> <p>24 was just collecting cash for the cash register.</p> <p>25 Q. Okay. And how --</p>

<p style="text-align: right;">Page 57</p> <p>1 A. It was not physical work.</p> <p>2 Q. How did your stroke affect you mentally or</p> <p>3 physically?</p> <p>4 A. Well, I can't get this -- this arm will</p> <p>5 only go up to here, and just the whole left-hand</p> <p>6 side is -- is screwed up.</p> <p>7 Q. Okay</p> <p>8 A. Pardon the expression.</p> <p>9 Q. And it's been that way since you were in</p> <p>10 your 20s and 30s?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay</p> <p>13 A. Well, actually, it -- I had gotten better</p> <p>14 for about four years, four or five years, and lately</p> <p>15 it's been going downhill, boom.</p> <p>16 Q. Right.</p> <p>17 A. And then I just recently had two or three</p> <p>18 minor strokes.</p> <p>19 Q. When was that?</p> <p>20 A. The last one was about two weeks ago.</p> <p>21 Q. Okay.</p> <p>22 A. And they picked me up off the floor and</p> <p>23 the next day put me in Westerly Hospital and they</p> <p>24 transferred me to where I am here.</p> <p>25 Q. Okay. And that was a couple of weeks ago?</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. That's all right? The stroke did not</p> <p>2 affect those --</p> <p>3 A. Seems to be okay. The only thing that</p> <p>4 I've had that might have been connected with it was</p> <p>5 I fell out of a -- a chair in my kitchen, hit my</p> <p>6 head good and hard.</p> <p>7 Q. When was that?</p> <p>8 A. That was after the stroke. And so I -- my</p> <p>9 friend, Mr. Sayles, he's been driving me because it</p> <p>10 affected my eyesight.</p> <p>11 Q. Okay.</p> <p>12 A. I have double vision now.</p> <p>13 Q. And did you have that fall after you got</p> <p>14 out of the Westerly Hospital?</p> <p>15 A. No. I --</p> <p>16 Q. Before?</p> <p>17 A. Before.</p> <p>18 Q. Okay.</p> <p>19 A. And while it -- while it didn't affect my</p> <p>20 memory or anything like that, it slowed me down as</p> <p>21 far as doing things around the house. I mean I</p> <p>22 could -- I still cooked my own meals and all that</p> <p>23 sort of stuff.</p> <p>24 Q. Right.</p> <p>25 A. Read books, even though I -- it's strange.</p>
<p style="text-align: right;">Page 58</p> <p>1 A. That was about ten days ago, eight to ten</p> <p>2 days ago.</p> <p>3 Q. Okay. So you were in the Westerly</p> <p>4 Hospital as recently as ten days ago or so?</p> <p>5 A. Oh, yeah. I was in there about ten days</p> <p>6 ago.</p> <p>7 Q. And it was your understanding at that time</p> <p>8 that you had suffered a stroke of some sort?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. Did you have a -- I think you said</p> <p>11 you had a stroke before that in the past several</p> <p>12 months or --</p> <p>13 A. Well, a minor one.</p> <p>14 Q. Minor?</p> <p>15 A. Several. I mean it -- just enough to</p> <p>16 knock me out a little bit.</p> <p>17 Q. Right. And how did they affect you</p> <p>18 mentally or physically?</p> <p>19 A. Slowed me right down. I mean every time</p> <p>20 anything like this happens, the left-hand side gets</p> <p>21 worse.</p> <p>22 Q. Right, right. What about mentally and</p> <p>23 your ability to understand things, remember things</p> <p>24 or --</p> <p>25 A. That's all right.</p>	<p style="text-align: right;">Page 60</p> <p>1 My eyesight is double on certain things and so I</p> <p>2 can't drive a car.</p> <p>3 Q. Right.</p> <p>4 A. But it limited me to -- to just about</p> <p>5 everything.</p> <p>6 Q. How long have you been at the Watch Hill</p> <p>7 Nursing Home here?</p> <p>8 A. I think about ten days.</p> <p>9 Q. Okay. When you got out of</p> <p>10 Westerly Hospital --</p> <p>11 A. I was put -- they brought me by</p> <p>12 ambulance --</p> <p>13 Q. -- they sent you here?</p> <p>14 A. -- to here.</p> <p>15 Q. And is the plan for you to stay --</p> <p>16 A. No.</p> <p>17 Q. -- here or are you going back at some</p> <p>18 point?</p> <p>19 A. I'm going to get the hell out of here.</p> <p>20 Q. Okay. I can understand. How long were</p> <p>21 you in the hospital just this past time? How long</p> <p>22 were you there?</p> <p>23 A. Up there, I was overnight.</p> <p>24 Q. Overnight?</p> <p>25 A. They picked me up. I guess one of my</p>

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<p style="text-align: right;">Page 61</p> <p>1 friends came down and found me on the floor.</p> <p>2 Q. At your house?</p> <p>3 A. Yeah, underneath a pile of chairs at the</p> <p>4 house. So he -- he called Dave Sayles and Dave</p> <p>5 Sayles called and got the ambulance and they hauled</p> <p>6 me up to Westerly Hospital.</p> <p>7 Q. Okay.</p> <p>8 A. And I've been here since then.</p> <p>9 Q. Who was the friend that found you in your</p> <p>10 house that made the call?</p> <p>11 A. The -- I guess Dave Sayles called the</p> <p>12 ambulance.</p> <p>13 Q. Okay.</p> <p>14 A. The fire chief. He has a lot of pull in a</p> <p>15 little town and --</p> <p>16 Q. Right. But who was it that found you in</p> <p>17 your house?</p> <p>18 A. A friend of mine from all over on -- at --</p> <p>19 near the boatyard. His name is -- oh, let me think</p> <p>20 now. I know it was my old -- but I can't remember</p> <p>21 it right -- right this second.</p> <p>22 Q. If it comes to you that's fine, you can --</p> <p>23 A. Yeah.</p> <p>24 Q. -- you can tell me. And you said that you</p> <p>25 were on several medications on a regular -- do you</p>	<p style="text-align: right;">Page 63</p> <p>1 to the Westerly Hospital, I think you said you had a</p> <p>2 couple of others?</p> <p>3 A. Yeah. I --</p> <p>4 Q. When did those occur?</p> <p>5 A. Oh, about a month before I had a minor one</p> <p>6 driving in the car. I managed to go up on the</p> <p>7 sidewalk and knock over the -- the dummy sign, so</p> <p>8 they drove me home in an ambulance and dropped the</p> <p>9 car off and then brought me back in the police</p> <p>10 cruiser. And -- but I've had that, and I've had</p> <p>11 them and I don't do anything about it.</p> <p>12 Q. Okay. But you had some sort of a car</p> <p>13 accident --</p> <p>14 A. I didn't, no.</p> <p>15 Q. -- a minor car accident?</p> <p>16 A. What I did is I ran up -- up on the</p> <p>17 sidewalk --</p> <p>18 Q. Uh-hum.</p> <p>19 A. -- dumped the dummy over, just pushed it</p> <p>20 over.</p> <p>21 Q. Right.</p> <p>22 A. I was in the process of putting it back</p> <p>23 up, a lady came along, and she says, "You need</p> <p>24 help?" I says, "No, I can get it all right." She</p> <p>25 said, "I'd better call the police." Nosy old woman.</p>
<p style="text-align: right;">Page 62</p> <p>1 take those on a regular basis?</p> <p>2 A. Well, I've been taking them here on a</p> <p>3 regular basis.</p> <p>4 Q. Right.</p> <p>5 A. I didn't take any medications on a regular</p> <p>6 basis other than some pills that helped me sleep --</p> <p>7 Q. Okay.</p> <p>8 A. -- a little bit at night. But I don't</p> <p>9 make a practice of it if I can help it.</p> <p>10 Q. And you said that you were not on morphine</p> <p>11 today. Do you get regular doses of morphine other</p> <p>12 than today?</p> <p>13 A. No. I don't take it.</p> <p>14 Q. Okay.</p> <p>15 A. They offer it to me and I won't take it.</p> <p>16 Q. Are you in pain on a daily basis?</p> <p>17 A. A minor amount.</p> <p>18 Q. Okay. And I think you said that you take</p> <p>19 Optivan?</p> <p>20 A. I guess that was one of the ones I read</p> <p>21 off.</p> <p>22 Q. Okay.</p> <p>23 A. I don't even know what half that stuff is</p> <p>24 for.</p> <p>25 Q. Okay. Prior to the stroke that sent you</p>	<p style="text-align: right;">Page 64</p> <p>1 But -- so that's how I got home.</p> <p>2 Q. So is it fair to say as recently as over</p> <p>3 the summer you were driving, this past summer?</p> <p>4 A. Oh, I was driving up until just before I</p> <p>5 went to the hospital.</p> <p>6 Q. Okay. All right. During the time that</p> <p>7 you were living with -- I think you said you were</p> <p>8 living off your family or parents -- did you receive</p> <p>9 any government subsidies, SSI, or other government</p> <p>10 programs as income?</p> <p>11 A. I got ten percent.</p> <p>12 Q. Ten percent of what?</p> <p>13 A. Of the military pay which amounted to just</p> <p>14 about nothing.</p> <p>15 Q. Okay</p> <p>16 A. \$19 --</p> <p>17 Q. All right. Military?</p> <p>18 A. -- a month.</p> <p>19 Q. A pension of some sort?</p> <p>20 A. Yeah.</p> <p>21 Q. Anything else from the government, any</p> <p>22 other --</p> <p>23 A. No.</p> <p>24 Q. -- government programs?</p> <p>25 A. Well --</p>

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<p style="text-align: right;">Page 65</p> <p>1 Q. Were you -- I'm sorry, go ahead.</p> <p>2 A. I've never been on any government subsidy.</p> <p>3 Q. Okay. I'm just wondering if as a result</p> <p>4 of the stroke that you had way back when you were a</p> <p>5 young man, if you were determined to be disabled and</p> <p>6 therefore they -- they paid you on a regular basis,</p> <p>7 on a monthly basis?</p> <p>8 A. Oh, no, no. That came at discharge time.</p> <p>9 They discharged me with a military discharge for --</p> <p>10 for medical purposes.</p> <p>11 Q. Okay. So you never got SSI or anything --</p> <p>12 A. No.</p> <p>13 Q. -- any program like that?</p> <p>14 A. No.</p> <p>15 Q. Okay.</p> <p>16 A. No.</p> <p>17 Q. And how long have you lived at your</p> <p>18 current address, your current home?</p> <p>19 A. Oh, about ten years.</p> <p>20 Q. Okay. Do you live there with anybody?</p> <p>21 A. No. I wish I did.</p> <p>22 Q. Okay. You live by yourself?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay.</p> <p>25 A. If I had somebody there, it'd probably be</p>	<p style="text-align: right;">Page 67</p> <p>1 A. I lived down in the beach area in a home</p> <p>2 my parents had. I converted the garage to a -- an</p> <p>3 apartment and lived there --</p> <p>4 Q. How long did you live --</p> <p>5 A. -- year-round.</p> <p>6 Q. I'm sorry.</p> <p>7 A. I lived there year-round. I either lived</p> <p>8 in West Hartford or I've lived in Weekapaug, Rhode</p> <p>9 Island for all my life.</p> <p>10 Q. Okay. Was that the first home that you</p> <p>11 purchased, this home that you bought --</p> <p>12 A. Yes.</p> <p>13 Q. -- about ten years ago? Okay.</p> <p>14 A. Yeah.</p> <p>15 Q. Over the course of your life, I imagine</p> <p>16 you've owned a number of motor vehicles?</p> <p>17 A. A few. Yeah, quite a few.</p> <p>18 Q. Have you had bank accounts at local banks</p> <p>19 or a --</p> <p>20 A. Local bank.</p> <p>21 Q. -- credit union?</p> <p>22 A. Local bank here, local bank West Hartford.</p> <p>23 Q. West Hartford. Okay. And any in Rhode</p> <p>24 Island, in Westerly?</p> <p>25 A. Yes. Westerly. Washington Trust.</p>
<p style="text-align: right;">Page 66</p> <p>1 better for me than being in a place like a nursing</p> <p>2 home, being home because --</p> <p>3 Q. Right.</p> <p>4 A. -- at home I can get around much -- much</p> <p>5 easier. Here they won't let me move, which has</p> <p>6 nothing to do with this business but...</p> <p>7 Q. No, I understand. But I'm just looking</p> <p>8 for some background.</p> <p>9 A. Yeah.</p> <p>10 Q. Was that a house -- is that a house that</p> <p>11 you own?</p> <p>12 A. No. I had it on reverse mortgage.</p> <p>13 Q. Okay.</p> <p>14 A. And that's running out.</p> <p>15 Q. Okay. At some point did you purchase the</p> <p>16 home or did you rent it?</p> <p>17 A. I -- I bought it outright.</p> <p>18 Q. Okay.</p> <p>19 A. And then I put a reverse mortgage on it.</p> <p>20 Q. Okay. But when you bought it outright,</p> <p>21 that was about ten years ago, and you've lived there</p> <p>22 since?</p> <p>23 A. Yeah.</p> <p>24 Q. All right. Before that, where did you</p> <p>25 live?</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. All right. And at Washington Trust, did</p> <p>2 you have a checking account, a savings account, or</p> <p>3 what kind of accounts?</p> <p>4 A. Both checking and savings.</p> <p>5 Q. Okay.</p> <p>6 A. Not much of an account but --</p> <p>7 Q. Right.</p> <p>8 A. -- I had them there.</p> <p>9 Q. Did you own those by yourself?</p> <p>10 A. Yeah.</p> <p>11 Q. And in terms of family, family members, I</p> <p>12 understand you talked about your parents. Any</p> <p>13 brothers or sisters?</p> <p>14 A. I have a sister. We're not talking.</p> <p>15 We've -- since my father died, we -- we have split.</p> <p>16 Q. Okay.</p> <p>17 A. There is no family relationship now.</p> <p>18 Q. All right. Just so -- so one sister and</p> <p>19 no other siblings?</p> <p>20 A. No.</p> <p>21 Q. Okay. Ever been married or had children?</p> <p>22 I take it no?</p> <p>23 A. No.</p> <p>24 Q. No, okay. Do you have a life insurance</p> <p>25 policy?</p>

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<p style="text-align: right;">Page 69</p> <p>1 A. No.</p> <p>2 Q. At the present time, do you have checking</p> <p>3 accounts and savings accounts and bank accounts at</p> <p>4 --</p> <p>5 A. Yeah, minor accounts.</p> <p>6 Q. All right. Have you ever invested in the</p> <p>7 stock market or securities of any kind?</p> <p>8 A. No. My parents did but not me.</p> <p>9 Q. All right. And you referenced Chief</p> <p>10 Sayles on a number of occasions. He's, I take it, a</p> <p>11 good friend of yours?</p> <p>12 A. Good friend of mine, personal friend.</p> <p>13 Q. All right. And how long have you known</p> <p>14 him would you say?</p> <p>15 A. Oh, 50 years I guess, maybe a little more.</p> <p>16 Q. Okay. And did you see him on a regular</p> <p>17 basis? When you were out at your home and -- well,</p> <p>18 did you see him on a regular basis?</p> <p>19 A. Yeah. He came down the house, and we'd</p> <p>20 see each other at the boatyard. I've known him, and</p> <p>21 he's a member of the Westerly Yacht Club which I'm</p> <p>22 also a member. Our boats were next to each other in</p> <p>23 the slips.</p> <p>24 Q. Uh-hum. Did you have your own boat?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. Okay. And assisting him is Mr. Vilker,</p> <p>2 seated next to him. Have you ever met Mr. Vilker</p> <p>3 before?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. Yesterday.</p> <p>7 Q. Yesterday also? Did you meet either of</p> <p>8 them before yesterday?</p> <p>9 A. No.</p> <p>10 Q. Oh, okay. So over the summer or August,</p> <p>11 September, before you got -- got ill, you had not</p> <p>12 met either Mr. Vilker or Mr. McAdams?</p> <p>13 A. No.</p> <p>14 Q. I take it you met Pamela McDaid of the FBI</p> <p>15 on at least one occasion?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Was -- was Chief Sayles with you on</p> <p>18 the first time that you met Raymour?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. He was at your house?</p> <p>21 A. Yes.</p> <p>22 Q. And was the meeting a three-way meeting</p> <p>23 between you, Raymour, with Chief Sayles being there?</p> <p>24 A. No. Actually, it was between me and</p> <p>25 Raymour.</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. What kind?</p> <p>2 A. Daytona.</p> <p>3 Q. How long did you own that?</p> <p>4 A. Oh, 10, 12, 14 years, somewhere around</p> <p>5 there.</p> <p>6 Q. How long ago? Going how far back?</p> <p>7 A. Three years ago it sunk.</p> <p>8 Q. Okay. But before that --</p> <p>9 A. I sold it. I got rid of it.</p> <p>10 Q. Okay.</p> <p>11 A. I had it -- I guess I had it 15 years or</p> <p>12 better, maybe 20 years.</p> <p>13 Q. Okay. And you were asked some questions</p> <p>14 by Mr. McAdams.</p> <p>15 MR. McADAMS: I'm over here.</p> <p>16 Q. And he's with the -- he's with the United</p> <p>17 States Attorney's Office. Before today, have you</p> <p>18 met him?</p> <p>19 A. Yes.</p> <p>20 Q. How many times?</p> <p>21 A. Yesterday.</p> <p>22 Q. Okay. And I'm not asking what he asked</p> <p>23 you, but I assume he asked you some questions and</p> <p>24 answers, things like that, right?</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. Uh-hum.</p> <p>2 A. But I'd asked the chief to be with me</p> <p>3 because I wasn't sure of myself.</p> <p>4 Q. Okay.</p> <p>5 A. You know.</p> <p>6 Q. I take it that as a good friend, you</p> <p>7 relied on his judgment and --</p> <p>8 A. Yes.</p> <p>9 Q. -- trusted his judgment to bounce things</p> <p>10 off him?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. And did that meeting come about as</p> <p>13 a result of a contact that was made with you by</p> <p>14 Sandy Romano of hospice?</p> <p>15 A. Yes.</p> <p>16 Q. And you know who Sandy Romano is?</p> <p>17 A. Yeah.</p> <p>18 Q. Okay. And she was a person that worked at</p> <p>19 hospice while --</p> <p>20 A. Hospice. She's my --</p> <p>21 Q. -- they were taking care of you? I'm</p> <p>22 sorry?</p> <p>23 A. She is my counselor or whatever they call</p> <p>24 it.</p> <p>25 Q. Okay.</p>

<p style="text-align: right;">Page 73</p> <p>1 A. Advisor.</p> <p>2 Q. And I take it you have a favorable opinion</p> <p>3 of her?</p> <p>4 A. Well, yes and no.</p> <p>5 Q. Tell me about that.</p> <p>6 A. She weighs so God damn much she broke down</p> <p>7 -- broke down my chair when she -- when she sits in</p> <p>8 it.</p> <p>9 Q. All right. That would lead to the</p> <p>10 unfavorable part, right?</p> <p>11 A. That was the unfavorable part.</p> <p>12 Q. What was favorable about her?</p> <p>13 A. Well, she's helped me out with my fuel</p> <p>14 oil --</p> <p>15 Q. Okay.</p> <p>16 A. -- just does things like that. She --</p> <p>17 she's kind of like a mentor toward me, you know,</p> <p>18 helps me here and there. She's done things for me.</p> <p>19 I wish she'd fix the chair.</p> <p>20 Q. Was she the first one that mentioned</p> <p>21 Raymour to you?</p> <p>22 A. Yes.</p> <p>23 Q. And what did she tell you about Raymour</p> <p>24 and what he was proposing?</p> <p>25 A. She told me -- she didn't tell me he was</p>	<p style="text-align: right;">Page 75</p> <p>1 A. They said between two and three.</p> <p>2 Q. Okay. And that's what she told you</p> <p>3 beforehand?</p> <p>4 A. She said that's what they have, and she</p> <p>5 said they got screwed once and that didn't concern</p> <p>6 me but that was the reason they needed all the IDs</p> <p>7 and stuff.</p> <p>8 Q. Okay.</p> <p>9 A. Which I gave them.</p> <p>10 Q. Okay. And so a meeting was set up and</p> <p>11 Raymour came to your house --</p> <p>12 A. Yeah.</p> <p>13 Q. -- in mid-January? Does that sound about</p> <p>14 right?</p> <p>15 A. Yeah.</p> <p>16 Q. And that meeting lasted for quite a while,</p> <p>17 didn't it?</p> <p>18 A. Not too long.</p> <p>19 Q. How long do you think it lasted?</p> <p>20 A. Oh, maybe an hour and a half at the most.</p> <p>21 Q. Okay, an hour and a half. And -- and what</p> <p>22 did he tell you at that meeting? What did he go</p> <p>23 over with you during that hour and a half?</p> <p>24 A. He just explained that this gentleman was</p> <p>25 giving out money to people that I guess they thought</p>
<p style="text-align: right;">Page 74</p> <p>1 proposing anything particular. She told me that</p> <p>2 there was a philanthropist in Providence or up in</p> <p>3 that area that was -- well, he had just heard giving</p> <p>4 out money to people that were on their way out, you</p> <p>5 know, helping them to try to clear up their bills or</p> <p>6 whatever when they croaked. So I believed</p> <p>7 everything she said, and I think she believed</p> <p>8 everything --</p> <p>9 Q. Uh-hum.</p> <p>10 A. -- too.</p> <p>11 Q. And --</p> <p>12 A. So I -- she got ahold of Raymour and</p> <p>13 Raymour got ahold of me, and that -- that's the</p> <p>14 first thing I knew of Raymour.</p> <p>15 Q. Okay. So you gave her your permission to</p> <p>16 reach out to that philanthropist?</p> <p>17 A. Yes.</p> <p>18 Q. And did you express to her at that point</p> <p>19 in time that you were interested in hearing more</p> <p>20 about it, that you needed some money?</p> <p>21 A. Well, I told her I could always use money.</p> <p>22 If somebody offered you \$3,000, you're going to take</p> <p>23 it, aren't you?</p> <p>24 Q. Sure. Did you know how much was being</p> <p>25 offered?</p>	<p style="text-align: right;">Page 76</p> <p>1 that needed it, and all I had to do was sign up and</p> <p>2 I'd get it and so I did.</p> <p>3 Q. Uh-hum.</p> <p>4 A. And --</p> <p>5 Q. He didn't give you any money at that first</p> <p>6 meeting, did he?</p> <p>7 A. No, no.</p> <p>8 Q. And he didn't ask you to sign any</p> <p>9 documents at that first meeting, did he?</p> <p>10 A. I'm not sure of that. He may have. I --</p> <p>11 I doubt it though.</p> <p>12 Q. Okay.</p> <p>13 A. So --</p> <p>14 Q. You don't have any memory of him doing</p> <p>15 that at -- as we sit here today, you don't remember</p> <p>16 him offering you any documents to sign at that first</p> <p>17 meeting, do you?</p> <p>18 A. I don't remember.</p> <p>19 Q. Okay. And during that discussion with</p> <p>20 Raymour, did you have a positive opinion of him?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. What -- what opinion did you</p> <p>23 express to Mr. Sayles about Raymour after the</p> <p>24 meeting?</p> <p>25 A. Well, I said to Dave, I said, "Dave," I</p>

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1 said, "what do you think?" "Well," he says, "take
2 it. They can't put you in jail when you're in the
3 ground." And I mean it made sense to take it.

4 **Q. Uh-hum.**

5 A. I could use it. And so I -- I mean hell,
6 anybody's a damn fool not to take it, but I don't
7 know.

8 **Q. And other than talking about the money
9 that he was going to give you, what else -- what
10 other topics did he cover during that first meeting?**

11 A. Oh, not too many things, just general
12 conversation and --

13 **Q. Did he ask you questions about your
14 background, your history, that kind of thing?**

15 A. No. We talked about cars that I'd owned
16 and cars that he's owned and just general
17 conversation.

18 **Q. Okay. And how did the meeting end in
19 terms of what was going to happen next after that
20 first meeting?**

21 A. Well, after the first meeting, he said, "I
22 need seven or nine days, nine or ten days to match
23 you up."

24 **Q. Uh-hum.**

25 A. Well, match me up with what I don't know.

1 MR. McADAMS: Objection.

2 A. No.

3 MR. McADAMS: He's asked and answered.

4 **Q. You don't have a memory of that --**

5 A. No, I don't.

6 **Q. -- as we sit here today? But you do have
7 a memory of him saying, "We need to match you up
8 with somebody"?**

9 A. Yeah. But I don't know if it was
10 somebody, with what or who.

11 **Q. Okay. But you do have that -- you have a
12 specific memory of that as we sit here?**

13 A. Yeah.

14 **Q. Okay. And there came a point after that
15 first meeting, after he left and after you had the
16 discussion with Mr. Sayles, where you called
17 Raymour, did you -- didn't you?**

18 A. No. I don't believe I ever called him.

19 **Q. Okay. How did the second meeting come
20 about?**

21 A. He called me --

22 **Q. Okay.**

23 A. -- asked if it was all right if he came
24 down.

25 **Q. I'm sorry?**

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1 I still don't know.

2 **Q. Well, did you ask him what he meant by
3 that?**

4 A. No, I didn't.

5 **Q. Why not?**

6 A. Why not? Because I wanted the -- the
7 three -- three grand.

8 **Q. Right. But what was your understanding
9 when he used the phrase, "We're going to match you
10 up"? He must have been referring to something.**

11 A. Well, I'm sure he was but I didn't ask
12 him.

13 **Q. Okay. Had he talked about any kind of
14 accounts that -- during that first meeting, had he
15 talked about any kinds of accounts or programs that
16 you might be interested in getting involved in?**

17 A. No.

18 **Q. And do you have a specific memory that he
19 did not mention that or you just don't remember?**

20 A. Well, he didn't. I mean I -- my
21 recollection is he never said anything about any
22 specific accounts in anything.

23 **Q. Okay. So you don't remember whether he
24 mentioned any kind of financial programs or accounts
25 or investment opportunities or anything like that?**

1 A. He called me and asked me if it was all
2 right if he came down the house.

3 **Q. So it was your memory that he called you
4 and not the other way around?**

5 A. Yeah.

6 **Q. Okay. And how long after that first
7 meeting is it your memory that he called you?**

8 A. Well, he said, "I'll probably be back in
9 nine days, eight or nine days." And then he called
10 up and he said, "Are you going to be home about two
11 o'clock?" And I specifically remember around two
12 o'clock. And he came down and then he gave me the
13 cash and paid me off or whatever you want to call
14 it.

15 **Q. Okay. So there was a second meeting?**

16 A. Yeah.

17 **Q. And that --**

18 A. And that was the one -- I believe it was
19 the second meeting. I don't think I -- he wanted to
20 come down a third time and I said no.

21 **Q. Okay.**

22 A. But the second meeting I believe is when
23 he paid -- paid me and paid me off.

24 **Q. Okay. And isn't it true that meeting
25 lasted a while also just as the first meeting did?**

23 (Pages 77 to 80)

<p style="text-align: right;">Page 81</p> <p>1 A. Not very long.</p> <p>2 Q. How long would you say the second meeting</p> <p>3 was?</p> <p>4 A. About the same time.</p> <p>5 Q. An hour and a half?</p> <p>6 A. An hour and a half. Maybe an hour and a</p> <p>7 half. I don't know.</p> <p>8 Q. Okay. But it wasn't ten minutes or</p> <p>9 fifteen minutes or anything like that?</p> <p>10 A. Oh, no, no, no.</p> <p>11 Q. Okay. So he was there for a while with</p> <p>12 you?</p> <p>13 A. Yeah.</p> <p>14 Q. Was Mr. Sayles there for that second</p> <p>15 meeting?</p> <p>16 A. No.</p> <p>17 Q. Okay. So it was just you --</p> <p>18 A. I didn't -- I didn't see any need.</p> <p>19 Q. Okay. And what was the discussion during</p> <p>20 that second meeting with Raymour? What did you talk</p> <p>21 about?</p> <p>22 A. Cars mainly.</p> <p>23 Q. Right.</p> <p>24 A. We didn't talk about anything about any</p> <p>25 investments or anything.</p>	<p style="text-align: right;">Page 83</p> <p>1 doesn't look anything like I usually sign.</p> <p>2 Q. Okay. So you don't have a memory of</p> <p>3 signing that document as we sit here today, do you?</p> <p>4 A. No.</p> <p>5 Q. Okay. And you're saying it doesn't even</p> <p>6 look like your full signature in terms of the</p> <p>7 Richard and the Wiley? That doesn't look like</p> <p>8 yours?</p> <p>9 A. The Richard and the Wiley look somewhat</p> <p>10 like it.</p> <p>11 Q. Somewhat. Uh-hum.</p> <p>12 A. And I'm no handwriting expert and I'm not</p> <p>13 even a good penmanship, but the G doesn't look like</p> <p>14 it's -- no --</p> <p>15 Q. Okay.</p> <p>16 A. -- it doesn't.</p> <p>17 Q. And do you have a memory sitting here</p> <p>18 today of Raymour going over this document with you?</p> <p>19 It's entitled "Brokerage Account" and there's other</p> <p>20 --</p> <p>21 A. No, no, no. No, I did not.</p> <p>22 Q. And are you saying he didn't or you don't</p> <p>23 remember it?</p> <p>24 A. He didn't go over it with me.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 82</p> <p>1 Q. No? Did he show you any documents that</p> <p>2 related to investments?</p> <p>3 A. No.</p> <p>4 Q. Okay. Did he ask for your signature on</p> <p>5 anything relating to an account or an investment?</p> <p>6 A. Well, he asked me for my signature when he</p> <p>7 paid me.</p> <p>8 Q. Right. Did he pay --</p> <p>9 A. That's -- that's when I signed --</p> <p>10 Q. Right.</p> <p>11 A. -- the papers and he gave me the money.</p> <p>12 Q. Right. You said he paid you at that first</p> <p>13 -- at that second meeting?</p> <p>14 A. Second meeting.</p> <p>15 Q. Okay.</p> <p>16 A. I believe it was the second.</p> <p>17 Q. Right. And Mr. McAdams showed you what</p> <p>18 they marked for identification purposes as</p> <p>19 Government Exhibit No. 1.</p> <p>20 A. Yeah.</p> <p>21 Q. And he asked you if that looked like your</p> <p>22 -- your signature on the -- on the third page of</p> <p>23 that document, and I think you indicated that it</p> <p>24 didn't -- you couldn't be sure it was yours?</p> <p>25 A. I couldn't be sure it was mine. The G</p>	<p style="text-align: right;">Page 84</p> <p>1 A. At least I've never seen it on this piece</p> <p>2 of paper.</p> <p>3 Q. Okay.</p> <p>4 A. I never saw anything with a \$5,000 on it.</p> <p>5 Q. Okay. Is it possible he went over this</p> <p>6 document and it wasn't filled in, that he went over</p> <p>7 a blank --</p> <p>8 A. I --</p> <p>9 Q. -- form of it?</p> <p>10 A. He could have done whatever he wanted with</p> <p>11 it. I wasn't there.</p> <p>12 Q. Well, when he was with you, is it possible</p> <p>13 that he went over a blank version without this</p> <p>14 writing on it? Is that possible?</p> <p>15 A. He could have, yes.</p> <p>16 Q. Okay. And on the second page, there's</p> <p>17 actually no writing, it's all typed. Is it possible</p> <p>18 that he went through that page even though there's</p> <p>19 no handwriting on it?</p> <p>20 A. Very much so.</p> <p>21 Q. Okay. And then on the third page, it's a</p> <p>22 signature page and --</p> <p>23 A. I never signed anything with Paula</p> <p>24 Caramadre's --</p> <p>25 Q. Right, right.</p>

<p style="text-align: right;">Page 85</p> <p>1 A. -- name on it.</p> <p>2 Q. Is it possible that that page -- prior to</p> <p>3 your signing it, is it possible that that page, when</p> <p>4 he showed it to you, did not have Paula Caramadre on</p> <p>5 it, that it was, in fact, blank?</p> <p>6 A. It could very well have been.</p> <p>7 Q. Okay. Do you know what it means to be a</p> <p>8 co-owner of something?</p> <p>9 A. Yeah.</p> <p>10 Q. What do you understand that to mean?</p> <p>11 A. Well, you're a joint owner in property of</p> <p>12 some sort.</p> <p>13 Q. Sure. It could be a car --</p> <p>14 A. A boat.</p> <p>15 Q. -- or an account? You and I could be a</p> <p>16 co-owner of a bank account, couldn't we?</p> <p>17 A. We could.</p> <p>18 Q. If we agreed?</p> <p>19 A. If we agreed.</p> <p>20 Q. If we wanted to, right?</p> <p>21 A. That's right.</p> <p>22 Q. Okay. So you understand the concept of</p> <p>23 being a joint owner?</p> <p>24 A. Yeah.</p> <p>25 Q. And do you understand the concept of being</p>	<p style="text-align: right;">Page 87</p> <p>1 Q. You don't remember that or he didn't do</p> <p>2 it?</p> <p>3 A. He didn't do it.</p> <p>4 Q. Okay. Did he read from any document that</p> <p>5 --</p> <p>6 A. He read, whisked right through very fast.</p> <p>7 Q. Okay.</p> <p>8 A. And --</p> <p>9 Q. And did he -- I'm sorry.</p> <p>10 A. And so I just listened as well as I could</p> <p>11 and --</p> <p>12 Q. Uh-hum.</p> <p>13 A. -- that was it.</p> <p>14 Q. Okay. Did you ask him any questions about</p> <p>15 what it meant?</p> <p>16 A. No.</p> <p>17 Q. Did you understand what it meant in some</p> <p>18 of those terms that I just talked about?</p> <p>19 A. I understand some of those terms you're</p> <p>20 talking about.</p> <p>21 Q. Okay. And you understand -- I take it</p> <p>22 from your earlier question -- question and answer,</p> <p>23 you did not, during the course of your life, own an</p> <p>24 investment account or a brokerage account of that</p> <p>25 nature. Am I correct about that?</p>
<p style="text-align: right;">Page 86</p> <p>1 a joint tenant?</p> <p>2 A. That's usually in property --</p> <p>3 Q. Right.</p> <p>4 A. -- of some sort.</p> <p>5 Q. Have you heard the phrase joint tenant</p> <p>6 with right of survivorship? Over the course of your</p> <p>7 life, have you heard that phrase?</p> <p>8 A. I've heard it, yes.</p> <p>9 Q. Okay. Being a joint tenant with a right</p> <p>10 of survivorship, what do you understand that to</p> <p>11 mean?</p> <p>12 A. Well, your son or your daughter or whoever</p> <p>13 inherits the property through joint survivorship.</p> <p>14 Q. Okay. So whoever passes away first, the</p> <p>15 joint tenant inherits the --</p> <p>16 A. Well, I don't know about that part of it</p> <p>17 but I --</p> <p>18 Q. Okay.</p> <p>19 A. -- I assume it sounds reasonable.</p> <p>20 Q. Right, okay. And isn't it true that --</p> <p>21 that Raymour went through -- in a blank version went</p> <p>22 through this document and some of those terms with</p> <p>23 you on that second meeting? Isn't that true that</p> <p>24 that's what he did?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. No, I never had any accounts.</p> <p>2 Q. Okay. But you're familiar with what a</p> <p>3 broker does for people?</p> <p>4 A. Well, I had an uncle that was a broker so</p> <p>5 I understood something about it.</p> <p>6 Q. He was a stock broker of some sort?</p> <p>7 A. (Non-verbal response.)</p> <p>8 THE REPORTER: Is that a yes?</p> <p>9 THE WITNESS: What?</p> <p>10 THE REPORTER: Did you say yes? Was that a</p> <p>11 yes to that question?</p> <p>12 A. I understand.</p> <p>13 Q. In addition to that document that I just</p> <p>14 referred to that's been Government 1 for ID,</p> <p>15 identification, did Raymour go over any other</p> <p>16 documents with you during that second meeting that</p> <p>17 you said lasted about an hour and a half?</p> <p>18 A. Not to my knowledge.</p> <p>19 Q. Okay. And am I correct that during the</p> <p>20 course of both the first and the second meeting, you</p> <p>21 gave --</p> <p>22 MR. PINE: Are you all right? Do you want</p> <p>23 -- if you want to take a break, we can absolutely --</p> <p>24 THE WITNESS: It's just that I've got a</p> <p>25 cartilage up here that's out of place and it hurts</p>

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<p style="text-align: right;">Page 89</p> <p>1 every once in a while.</p> <p>2 MR. PINE: All right. I'm just saying if</p> <p>3 you want to take any kind of a break, nobody here</p> <p>4 will argue with you. All right? Just say it.</p> <p>5 THE WITNESS: I'm all right.</p> <p>6 MR. PINE. Okay. It's up to you.</p> <p>7 BY MR. PINE</p> <p>8 Q. Is it fair to say that during the course</p> <p>9 of the first and second meeting, that you gave</p> <p>10 Raymour information about yourself, driver's license</p> <p>11 information, Social Security number information,</p> <p>12 other kinds of information that were personal to</p> <p>13 you? Is that --</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And you did that because he</p> <p>16 requested that information from you, and what was</p> <p>17 your understanding of the reason that you were going</p> <p>18 to be giving him that information?</p> <p>19 A. Well, I had been told that they had had --</p> <p>20 previously they gave money out to people, the same</p> <p>21 -- under, you know, the same conditions, that needed</p> <p>22 money and -- and somebody took quite a bit of money</p> <p>23 from them and then turned around and I guess they</p> <p>24 either -- he didn't say specifically what they used</p> <p>25 it for but they -- they -- they turned around and</p>	<p style="text-align: right;">Page 91</p> <p>1 wouldn't ordinarily do that, would you?</p> <p>2 A. No.</p> <p>3 Q. But you did on this occasion?</p> <p>4 A. Well, I did it on that occasion mainly</p> <p>5 because they told me that they had to see it. Now,</p> <p>6 I -- I don't know what -- I would not go and just</p> <p>7 hand anybody my IDs unless I trusted them.</p> <p>8 Q. Right. Right.</p> <p>9 A. And I trusted Raymour that everything was</p> <p>10 on the up and up. They were working through Social</p> <p>11 Security -- not Social Security. They were working</p> <p>12 through hospice, which is a legitimate organization,</p> <p>13 so I had no -- no doubts about it being all okay.</p> <p>14 Sandy Romano, she was the one that first brought it</p> <p>15 up. She was hospice and she had no doubts about it</p> <p>16 being all right.</p> <p>17 Q. Right.</p> <p>18 A. And the other one, the nurse, she said it</p> <p>19 was okay so I went along with it.</p> <p>20 Q. But you do agree that Raymour both used</p> <p>21 the phrase, "We're going to match you up with</p> <p>22 somebody," and read through documents --</p> <p>23 MR. McADAMS: Objection.</p> <p>24 Q. -- to you?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 90</p> <p>1 sued the people that put up the fund.</p> <p>2 Q. And this is information that you got from</p> <p>3 Raymour?</p> <p>4 A. I got it from Sandy Romano and -- and</p> <p>5 Raymour that they needed a verification. Naturally,</p> <p>6 you're not going to give away \$3,000 --</p> <p>7 Q. Right.</p> <p>8 A. -- without some identification of who</p> <p>9 you're giving it to.</p> <p>10 Q. Uh-hum.</p> <p>11 A. Now, it -- it can be used for two purpose</p> <p>12 -- two purposes. They use it to take -- buy</p> <p>13 something in your name with, they use it -- they can</p> <p>14 use it for almost anything, but he didn't indicate</p> <p>15 that he -- he was using it for buying any stocks or</p> <p>16 bonds or anything of that sort. Naturally, I would</p> <p>17 not have done it.</p> <p>18 Q. Well, did he indicate to you that he was</p> <p>19 using it in conjunction with you being a co-owner --</p> <p>20 A. No.</p> <p>21 Q. -- as is referenced on that form?</p> <p>22 A. Definitely not.</p> <p>23 Q. Well, have you ever given out your Social</p> <p>24 Security number or personal information in order to</p> <p>25 be a -- as a receipt for getting money? You</p>	<p style="text-align: right;">Page 92</p> <p>1 MR. McADAMS: Objection. Assuming facts</p> <p>2 not in evidence.</p> <p>3 Q. Did -- you have said that Raymour</p> <p>4 referenced both matching you up with somebody,</p> <p>5 correct --</p> <p>6 A. Yes.</p> <p>7 Q. -- you talked about that earlier today,</p> <p>8 and that he also read through some documents for</p> <p>9 you on that --</p> <p>10 MR. McADAMS: Objection to that question.</p> <p>11 Q. -- second meeting?</p> <p>12 MR. McADAMS: That's not what he testified.</p> <p>13 Q. Did Raymour read through some documents</p> <p>14 with you on that second occasion?</p> <p>15 A. Well, a little bit. He read like a top</p> <p>16 paragraph on something like that and that was it.</p> <p>17 Q. Okay.</p> <p>18 A. And I didn't fully understand what it was</p> <p>19 all about. It was not about -- at the time I -- it</p> <p>20 didn't have anything to say about buying stocks,</p> <p>21 bonds or anything of that sort. I had no idea what</p> <p>22 it -- what he wanted my IDs for.</p> <p>23 Q. But you gave him your ID --</p> <p>24 A. But I --</p> <p>25 Q. -- information?</p>

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<p style="text-align: right;">Page 93</p> <p>1 A. Yup, I guess.</p> <p>2 Q. And you said you understand what the</p> <p>3 concept and meaning is of being a co-owner of a --</p> <p>4 A. Yes.</p> <p>5 Q. -- particular account?</p> <p>6 A. Yes.</p> <p>7 Q. And he spent -- you also agree he spent an</p> <p>8 hour and a half with you on both occasions or</p> <p>9 approximately that?</p> <p>10 A. Well, approximately. I don't know whether</p> <p>11 -- a lot of, you know, there was a lot of talk along</p> <p>12 with it.</p> <p>13 Q. Now, you were asked by the FBI to record a</p> <p>14 meeting with Raymour and Attorney Flanders; is that</p> <p>15 correct?</p> <p>16 A. They asked me if I would allow them to use</p> <p>17 my house and I said yes.</p> <p>18 Q. Okay. And to -- beyond use your house, to</p> <p>19 wear a wire; is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Had you ever done that before?</p> <p>22 THE WITNESS: What, wear a wire?</p> <p>23 MR. PINE: Wear a wire, right.</p> <p>24 A. No, I haven't.</p> <p>25 Q. Act for the FBI and undercover, all that?</p>	<p style="text-align: right;">Page 95</p> <p>1 received that money, didn't you?</p> <p>2 A. Yes, I did.</p> <p>3 Q. What did the FBI agent tell you in order</p> <p>4 to persuade you to wear a wire?</p> <p>5 MR. McADAMS: Objection. He said that</p> <p>6 wasn't the basis of his decision to wear the wire.</p> <p>7 MR. PINE: Okay.</p> <p>8 MR. McADAMS: And hearsay.</p> <p>9 A. Yup. Well, when I heard that they were</p> <p>10 taking money from the people who were down and out</p> <p>11 and using it to their advantage, rather than the</p> <p>12 advantage of the people whose parents were on the</p> <p>13 way out, dying or who -- whatever it was, I decided</p> <p>14 that what they were doing was not very ethical</p> <p>15 and --</p> <p>16 Q. Okay.</p> <p>17 A. -- and that pissed me off. Pardon the</p> <p>18 expression.</p> <p>19 Q. Okay. And you said when you found out</p> <p>20 that they were taking money from people. Isn't that</p> <p>21 what you just said? They didn't take any money from</p> <p>22 you, did they?</p> <p>23 A. No, they didn't take any money. They were</p> <p>24 taking money away from the survivors of people in</p> <p>25 this joint tenant business deal that they had cooked</p>
<p style="text-align: right;">Page 94</p> <p>1 A. (Non-verbal response.)</p> <p>2 THE REPORTER: Excuse me. You have to say</p> <p>3 -- you have to answer verbally. Is that --</p> <p>4 A. No. I...</p> <p>5 THE REPORTER: Okay. Thank you.</p> <p>6 Q. And -- but you agreed to do that?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. And you didn't tell either Raymour</p> <p>9 or Mr. Flanders that you were doing that?</p> <p>10 A. No.</p> <p>11 Q. The FBI asked you not to tell them that,</p> <p>12 right?</p> <p>13 A. Not necessarily.</p> <p>14 Q. Well, what was your --</p> <p>15 A. I made up my mind --</p> <p>16 Q. Okay.</p> <p>17 A. -- once I found out what was going on --</p> <p>18 Q. Okay.</p> <p>19 A. -- with the accounts.</p> <p>20 Q. Okay. You were paid the money that</p> <p>21 Raymour talked about in the initial meeting, weren't</p> <p>22 you? You were paid money?</p> <p>23 A. Not in the initial meeting.</p> <p>24 Q. No, but the money that he referred to in</p> <p>25 the initial meeting from a philanthropist, you</p>	<p style="text-align: right;">Page 96</p> <p>1 up. They were --</p> <p>2 Q. Well, in your case, who were they taking</p> <p>3 the money from?</p> <p>4 A. They --</p> <p>5 Q. They weren't taking -- I'm sorry, go</p> <p>6 ahead.</p> <p>7 A. Well, they were taking it from themselves</p> <p>8 in a way.</p> <p>9 Q. What do you mean? They weren't taking any</p> <p>10 of your money, were they?</p> <p>11 A. No, no.</p> <p>12 Q. And they weren't taking it from any</p> <p>13 relative of yours --</p> <p>14 A. No.</p> <p>15 Q. -- because you didn't have a joint account</p> <p>16 with any relative of yours?</p> <p>17 A. No. Well, they were taking it from the</p> <p>18 poor people that -- that needed it and using them as</p> <p>19 an excuse to open bank accounts and joint accounts</p> <p>20 and things of that sort so that they --</p> <p>21 Q. But they weren't using any of your</p> <p>22 money --</p> <p>23 A. No --</p> <p>24 Q. -- to open an account?</p> <p>25 A. -- they weren't. No, they weren't.</p>

<p style="text-align: right;">Page 97</p> <p>1 Q. They didn't take any money out of your</p> <p>2 account?</p> <p>3 A. No, they didn't.</p> <p>4 Q. Okay. And, in fact --</p> <p>5 A. Just the whole thing is a non --</p> <p>6 nonethical thing to do.</p> <p>7 Q. Well, did the agent tell you that they</p> <p>8 were taking money from you?</p> <p>9 A. No.</p> <p>10 Q. I thought that's what you said.</p> <p>11 A. But I still didn't like the idea, period.</p> <p>12 It was wrong.</p> <p>13 Q. And so that's why you agreed to wear the</p> <p>14 wire?</p> <p>15 A. That's why I agreed to wear the wire.</p> <p>16 Q. Isn't it fair to say that you received</p> <p>17 money from the philanthropist that otherwise you</p> <p>18 would not have received?</p> <p>19 A. That's very true. Very true and very</p> <p>20 fair. But when somebody comes along and offers you</p> <p>21 money and you -- you took -- I mean I took it. I'd</p> <p>22 be foolish not to. But then afterwards, once I</p> <p>23 found out, I could have paid them back right away</p> <p>24 and given them their money right back if I'd known</p> <p>25 what was going on.</p>	<p style="text-align: right;">Page 99</p> <p>1 form?</p> <p>2 A. I recognize the names on there but I don't</p> <p>3 recognize that form at all.</p> <p>4 Q. Okay. Is it possible that form was shown</p> <p>5 to you in a blank version at some point?</p> <p>6 A. Could very well have been.</p> <p>7 Q. Shown to you by --</p> <p>8 A. I don't know.</p> <p>9 Q. -- by Raymour?</p> <p>10 A. Don't know.</p> <p>11 Q. Is it possible he read to you from the</p> <p>12 form or talked about the form with you?</p> <p>13 A. He could have. He could have. I mean I</p> <p>14 can't say for sure. He was sitting there and I was</p> <p>15 sitting here and --</p> <p>16 Q. Right. So it's certainly possible that he</p> <p>17 did, you just don't have a memory of it?</p> <p>18 A. Don't have a memory of it and can't say.</p> <p>19 Like I say, I can't -- I can't be sure but that does</p> <p>20 look something like my signature.</p> <p>21 Q. All right. And you were asked about your</p> <p>22 signature on that -- on that form?</p> <p>23 A. Yeah. That does look something like --</p> <p>24 Q. It looks something like it?</p> <p>25 A. Yup. The G doesn't look right and I would</p>
<p style="text-align: right;">Page 98</p> <p>1 Q. You would have given the money back?</p> <p>2 A. I would have given the money back.</p> <p>3 Q. Did you ever attempt to do that?</p> <p>4 A. No.</p> <p>5 Q. You haven't --</p> <p>6 A. No.</p> <p>7 Q. -- attempted to do that? Do you recall a</p> <p>8 not just a second meeting with Raymour but a third</p> <p>9 meeting with him?</p> <p>10 A. No, I don't.</p> <p>11 Q. Okay. This meeting would have happened</p> <p>12 sometime after the meeting that you had in -- with</p> <p>13 him in mid to late January where --</p> <p>14 A. January, sometime in January.</p> <p>15 Q. Do you recall that?</p> <p>16 A. No.</p> <p>17 Q. No, okay. So as we sit here today, you</p> <p>18 don't recall any follow-up meeting other than the</p> <p>19 time that he came to your house with Attorney</p> <p>20 Flanders?</p> <p>21 A. Just the payoff meeting was all.</p> <p>22 Q. Right. The second meeting?</p> <p>23 A. Yeah, yeah.</p> <p>24 Q. And showing you what the government marked</p> <p>25 for identification as No. 2, do you recognize that</p>	<p style="text-align: right;">Page 100</p> <p>1 usually sign my name Richard G. Wiley.</p> <p>2 Q. Right.</p> <p>3 A. Richard G. My mother always used to use</p> <p>4 her -- her maiden initial.</p> <p>5 Q. Uh-hum.</p> <p>6 A. So I used to use it.</p> <p>7 Q. Okay. But you're not positive about that</p> <p>8 being your signature on that document?</p> <p>9 A. I'm not positive.</p> <p>10 Q. Okay. And you don't have a memory of</p> <p>11 signing it as we sit here today?</p> <p>12 A. No, I don't.</p> <p>13 Q. Okay. This also in the block -- in the</p> <p>14 blocks refers to -- it's the preprinted part. It</p> <p>15 refers to somebody being an account owner and</p> <p>16 somebody else being an account co-owner. You</p> <p>17 understand what those terms mean?</p> <p>18 A. Owner, co-owner, yes.</p> <p>19 Q. And an account co-owner and an account</p> <p>20 owner, you understand that?</p> <p>21 A. The owner and a co-owner is partners with</p> <p>22 him in whatever it happens --</p> <p>23 Q. Right.</p> <p>24 A. -- to be.</p> <p>25 Q. And in the other block it says "Authorized</p>

<p style="text-align: right;">Page 101</p> <p>1 Agent." You understand when somebody -- somebody is</p> <p>2 acting as an agent?</p> <p>3 A. Agent, yeah.</p> <p>4 Q. Okay. That's -- those are not foreign or</p> <p>5 unknown terms to you?</p> <p>6 A. No. It could be a --</p> <p>7 Q. Okay.</p> <p>8 A. -- an attorney or a mentor of some sort --</p> <p>9 Q. Sure.</p> <p>10 A. -- or whatever.</p> <p>11 Q. During the course of --</p> <p>12 MR. McADAMS: Do you need to take a break?</p> <p>13 I'm sorry.</p> <p>14 MR. PINE: No, that's all right.</p> <p>15 MR. McADAMS: Mr. Wiley, do you want to</p> <p>16 take a few minutes for a break?</p> <p>17 MR. PINE. I think it's probably a good</p> <p>18 time to break, sure.</p> <p>19 MR. McADAMS: Why don't we take a break?</p> <p>20 We'll go get a nurse for you, come and get you, feed</p> <p>21 you some lunch, and we'll -- we'll figure out what</p> <p>22 we're going to do while you're doing that. Is that</p> <p>23 okay, Mr. Wiley?</p> <p>24 THE WITNESS: It's okay with me.</p> <p>25 MR. McADAMS: Okay, thanks. Thank you.</p>	<p style="text-align: right;">Page 103</p> <p>1 A. Well, when I found out what your client</p> <p>2 was using -- before I got a little bit upset.</p> <p>3 Q. Uh-hum.</p> <p>4 A. And although he was delivering monies to</p> <p>5 the people, they had no idea that he was being used</p> <p>6 either.</p> <p>7 Q. Well, you don't know what other people --</p> <p>8 A. I don't know.</p> <p>9 Q. -- knew or didn't know?</p> <p>10 A. I don't know but I'm assuming --</p> <p>11 Q. Right. But --</p> <p>12 A. -- that this is what happened.</p> <p>13 Q. But -- but what did she tell you about</p> <p>14 what he was supposed to be doing?</p> <p>15 MR. McADAMS: Objection, hearsay.</p> <p>16 MR. MacFADYEN: Objection. Calls for</p> <p>17 hearsay.</p> <p>18 A. Nothing -- nothing specific.</p> <p>19 Q. Well, did she tell you that they were</p> <p>20 taking money from people?</p> <p>21 A. No, she didn't.</p> <p>22 Q. I thought you said that before.</p> <p>23 A. No, no, not taking money from people.</p> <p>24 Q. Well --</p> <p>25 A. I indicated that they were using a --</p>
<p style="text-align: right;">Page 102</p> <p>1 THE VIDEOGRAPHER: The time is 11:01. Off</p> <p>2 the record.</p> <p>3 (RECESS)</p> <p>4 THE VIDEOGRAPHER: The time is 11:19.</p> <p>5 We're back on the record.</p> <p>6 BY MR. PINE:</p> <p>7 Q. Mr. Wiley, before we broke, I had asked</p> <p>8 you a couple of questions regarding your interaction</p> <p>9 with Agent McDaid of the FBI. Do you recall we just</p> <p>10 discussed that?</p> <p>11 THE WITNESS: Well, what do you mean by</p> <p>12 interact?</p> <p>13 MR. PINE: I'm sorry?</p> <p>14 THE WITNESS: You mean wanting to use the</p> <p>15 house?</p> <p>16 MR. PINE: Use the house, wear a wire, that</p> <p>17 kind of thing.</p> <p>18 A. Yes.</p> <p>19 Q. And she obviously spoke with you -- I'm</p> <p>20 sorry. She obviously spoke with you before that</p> <p>21 day, before that took place, right?</p> <p>22 A. Yeah.</p> <p>23 Q. And I think you said as a result of</p> <p>24 information that she gave you, that you got, quote,</p> <p>25 pissed off. Didn't you say that a little while ago?</p>	<p style="text-align: right;">Page 104</p> <p>1 well, kind of a flimflam way of --</p> <p>2 THE REPORTER: Kind of a -- excuse me, kind</p> <p>3 of a --</p> <p>4 A. Flimflam way of getting clients so to</p> <p>5 speak.</p> <p>6 Q. And was that her expression?</p> <p>7 A. No, that's my expression.</p> <p>8 Q. Well, but what did she tell you that they</p> <p>9 were doing --</p> <p>10 MR. McADAMS: Objection. Calls for</p> <p>11 hearsay.</p> <p>12 Q. -- to persuade you to wear a wire?</p> <p>13 MR. McADAMS: Objection.</p> <p>14 A. Well -- well, what I heard was they were</p> <p>15 looking to get the owner of that Camrades (sic)</p> <p>16 there to find out -- get them prosecuted for the way</p> <p>17 they were operating.</p> <p>18 Q. Okay.</p> <p>19 A. It was not ethical, it was not proper and</p> <p>20 --</p> <p>21 Q. So she -- did she mention specific names?</p> <p>22 You said the owner of the --</p> <p>23 A. Well, the --</p> <p>24 Q. -- did you say Caramadre?</p> <p>25 A. Ca -- Camadre (sic) or --</p>

<p style="text-align: right;">Page 105</p> <p>1 MR. McADAMS: Objection.</p> <p>2 MR. MacFADYEN: Objection.</p> <p>3 A. -- whatever you want to...</p> <p>4 Q. Yeah. And they were looking to prosecute</p> <p>5 him?</p> <p>6 MR. McADAMS: Objection on the hearsay</p> <p>7 grounds again.</p> <p>8 Q. Is that what she -- she told you that they</p> <p>9 were looking to do?</p> <p>10 MR. MacFADYEN: Same objection.</p> <p>11 MR. McADAMS: Objection. Hearsay.</p> <p>12 A. No. More or less she didn't tell me any</p> <p>13 specific thing. They -- evidently Raymour was</p> <p>14 representing them but they were using I think</p> <p>15 Raymour too to go out and get the clients for them.</p> <p>16 Q. Uh-hum.</p> <p>17 A. And I don't know what they were paying</p> <p>18 him, what -- what -- what was going on but it was to</p> <p>19 me what I call a shady operation.</p> <p>20 Q. Okay. And --</p> <p>21 A. No good stockbroker would --</p> <p>22 Q. And you drew that conclusion --</p> <p>23 A. Conclusion.</p> <p>24 Q. -- based on a conversation that you had</p> <p>25 with her?</p>	<p style="text-align: right;">Page 107</p> <p>1 MR. PINE: I thought you said she broke a</p> <p>2 chair of yours.</p> <p>3 A. Oh, no. That --</p> <p>4 Q. But I'm asking do you have a favorable</p> <p>5 opinion of her or unfavorable opinion of her for</p> <p>6 other reasons?</p> <p>7 A. That -- that had -- no, I don't think too</p> <p>8 much of her as a -- a representative of hospice.</p> <p>9 Q. Okay. Did you have any contact with any</p> <p>10 other FBI agents other than Pamela McDaid?</p> <p>11 A. No.</p> <p>12 Q. And how many --</p> <p>13 A. Wait a minute, wait a minute. Just the</p> <p>14 fellow that came down and wired.</p> <p>15 Q. Okay.</p> <p>16 A. He was the only other.</p> <p>17 Q. Okay. And how many conversations did you</p> <p>18 have with her?</p> <p>19 THE WITNESS: Who, Pamela?</p> <p>20 MR. PINE: Yeah.</p> <p>21 A. Well, she's become like more or less of a</p> <p>22 personal sort of a friend, and she came down and</p> <p>23 said hello. She brought her son down.</p> <p>24 Q. Brought her son down?</p> <p>25 A. She was both interested in boating and she</p>
<p style="text-align: right;">Page 106</p> <p>1 MR. McADAMS: Objection. Hearsay.</p> <p>2 Q. Is that correct?</p> <p>3 A. Not entirely with her.</p> <p>4 Q. Who -- who else did you speak with?</p> <p>5 A. I talked with Sandy. She was my woman who</p> <p>6 -- adviser from the -- what do you call it?</p> <p>7 Q. From hospice?</p> <p>8 A. Hospice.</p> <p>9 Q. Right. Did you have a conversation with</p> <p>10 Sandy after your meetings with Raymour?</p> <p>11 A. Several conversations.</p> <p>12 Q. Okay.</p> <p>13 A. She came to the house.</p> <p>14 Q. And did she ever express to you any</p> <p>15 disapproval --</p> <p>16 MR. McADAMS: Objection. Hearsay.</p> <p>17 MR. MacFADYEN: Objection. Hearsay.</p> <p>18 Q. -- about what Raymour was doing?</p> <p>19 A. Well, she never said to me, you know...</p> <p>20 Q. Do you still have a favorable opinion of</p> <p>21 Sandy?</p> <p>22 A. Not really.</p> <p>23 Q. Because of the chair episode or for other</p> <p>24 reasons?</p> <p>25 THE WITNESS: Because of what?</p>	<p style="text-align: right;">Page 108</p> <p>1 had just bought a -- bought a boat. It was a</p> <p>2 friendly conversation.</p> <p>3 Q. Okay. And did she come down on more than</p> <p>4 one occasion I -- I take it?</p> <p>5 A. Yeah. She came down to see how I was</p> <p>6 doing physically.</p> <p>7 Q. Right.</p> <p>8 A. And brought me something, you know, baked</p> <p>9 me some stuff, cookies and stuff, but that was it.</p> <p>10 Q. So she brought you --</p> <p>11 A. She didn't bribe me.</p> <p>12 Q. No, I understand, but she brought you</p> <p>13 baked goods of some sort?</p> <p>14 A. Yeah.</p> <p>15 Q. And she introduced you to her son; is that</p> <p>16 correct?</p> <p>17 A. Just -- yeah. Nice -- nice boy, good boy.</p> <p>18 Q. Did she introduce you to him on more than</p> <p>19 one occasion or just once?</p> <p>20 A. Just once.</p> <p>21 Q. And did she spend a while with you, spend</p> <p>22 some time with you?</p> <p>23 A. About half an hour or so.</p> <p>24 Q. And during --</p> <p>25 A. Conversation and just general pleasurable</p>

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<p style="text-align: right;">Page 109</p> <p>1 afternoon conversation.</p> <p>2 Q. Okay. And was part of that conversation</p> <p>3 devoted to the business practices of Raymour and --</p> <p>4 and Mr. Caramadre or other individuals? In part of</p> <p>5 that conversation, did that come up?</p> <p>6 THE WITNESS: Camadre (sic)?</p> <p>7 MR. PINE: I'll strike that.</p> <p>8 Q. Was part of the conversation devoted to</p> <p>9 the business practices of Raymour?</p> <p>10 MR. McADAMS: Objection for hearsay.</p> <p>11 A. Well, somewhat. She expressed her</p> <p>12 opinion, I expressed my opinion.</p> <p>13 Q. Okay. And what opinion did she express to</p> <p>14 you?</p> <p>15 A. Well --</p> <p>16 MR. McADAMS: Objection. Hearsay.</p> <p>17 A. -- neither one -- neither one was very</p> <p>18 favorable.</p> <p>19 Q. Right.</p> <p>20 A. But that -- that's about as far as it</p> <p>21 went.</p> <p>22 Q. All right. Did she talk -- I thought</p> <p>23 before the break you referenced that they were</p> <p>24 taking money from poor people or people who deserved</p> <p>25 the money --</p>	<p style="text-align: right;">Page 111</p> <p>1 an attorney?</p> <p>2 Q. No. To have a conversation at your house</p> <p>3 with Raymour and an attorney, right?</p> <p>4 A. Well, I volunteered.</p> <p>5 Q. Right.</p> <p>6 A. They didn't put any bite on me.</p> <p>7 Q. Well, did you suggest, "I'll wear a wire,"</p> <p>8 or did she ask you to wear a wire?</p> <p>9 A. I didn't suggest anything.</p> <p>10 Q. Okay. She asked you?</p> <p>11 A. I was asked if it was all right if they</p> <p>12 could record somebody.</p> <p>13 Q. Right. And you agreed?</p> <p>14 A. Yeah.</p> <p>15 Q. Based on the information that she had</p> <p>16 given you?</p> <p>17 A. Well, yes, for where else would I have got</p> <p>18 it?</p> <p>19 Q. Naturally. Did -- you said that when you</p> <p>20 were with Raymour, you had a favorable opinion of</p> <p>21 him, right, when -- during those meetings --</p> <p>22 A. Yeah.</p> <p>23 Q. -- that you had? Did he ever force you to</p> <p>24 do anything?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 110</p> <p>1 A. Well --</p> <p>2 Q. -- or something like that.</p> <p>3 A. -- I probably said what I didn't mean.</p> <p>4 Q. All right.</p> <p>5 A. I don't know, but it seems to me the</p> <p>6 people that needed the money were the children or</p> <p>7 mothers or fathers of whoever was on the way out.</p> <p>8 Q. Uh-hum.</p> <p>9 A. Not the Camrades or Camrade (sic).</p> <p>10 Q. I --</p> <p>11 A. I used to work for somebody named Camrade</p> <p>12 so I get them --</p> <p>13 Q. I understand. So she expressed certain</p> <p>14 opinions to you and you, in turn, expressed certain</p> <p>15 opinions to her --</p> <p>16 A. Yeah.</p> <p>17 MR. McADAMS: Objection. Hearsay.</p> <p>18 Q. -- during those conversations, correct?</p> <p>19 A. Yeah, some, but we didn't talk about it</p> <p>20 much.</p> <p>21 Q. Okay. But enough that she got your</p> <p>22 agreement to record a meeting with Raymour and an</p> <p>23 attorney, right? She was able to convince you to do</p> <p>24 that?</p> <p>25 THE WITNESS: To get Raymour to talk with</p>	<p style="text-align: right;">Page 112</p> <p>1 Q. Ever coerce you?</p> <p>2 THE WITNESS: Why would he? Why would he?</p> <p>3 MR. PINE: I don't know.</p> <p>4 Q. He never did?</p> <p>5 A. No.</p> <p>6 MR. PINE: Okay. That's all I have.</p> <p>7 THE VIDEOGRAPHER: Are we off the record?</p> <p>8 MR. PINE: Sure.</p> <p>9 THE VIDEOGRAPHER: We're going off the</p> <p>10 record. The time is 12 -- 11:30.</p> <p>11 (OFF THE RECORD)</p> <p>12 THE VIDEOGRAPHER: The time is 11:31. Back</p> <p>13 on the record.</p> <p>14 CROSS-EXAMINATION</p> <p>15 BY MR. FLANDERS:</p> <p>16 Q. Good morning, Mr. Wiley.</p> <p>17 A. Hi.</p> <p>18 Q. My name is Robert Flanders and I represent</p> <p>19 Joseph and Paula Caramadre.</p> <p>20 A. Hi.</p> <p>21 Q. You and I have met before?</p> <p>22 A. That's right.</p> <p>23 Q. I was at your house in -- earlier in the</p> <p>24 summer I think. Is that right?</p> <p>25 A. Yeah. Well, yes, it was early summer.</p>

<p style="text-align: right;">Page 113</p> <p>1 Q. Right. And that was the first time you 2 and I had met? 3 A. Met. 4 Q. I was with Raymour and you were there with 5 Mr. Sayles? 6 A. Right. 7 Q. And this was the meeting that was recorded 8 secretly, right? 9 A. Right. 10 Q. You didn't tell me that you were recording 11 that meeting? 12 A. No, I didn't. No, I didn't. 13 Q. And that was the meeting that the FBI was 14 there before and after the meeting speaking with you 15 about it? 16 A. They came and asked me permission and I 17 gave them permission. 18 Q. And is that -- is that Ms. McDaid or the 19 FBI agent, Pamela McDaid? 20 A. Yes. 21 Q. When is the first time you met Ms. 22 McDaid? 23 A. God, I don't know. The first time she 24 came to my house. 25 Q. How did she come to -- how did --</p>	<p style="text-align: right;">Page 115</p> <p>1 Raymour and signed up the documents and gotten your 2 money? 3 A. That's right, yeah. 4 Q. Okay. So after you had had your meetings 5 with Raymour and signed up the documents and 6 received your money from Raymour, sometime after 7 that, Ms. McDaid showed up at your house -- 8 A. Yes. 9 Q. -- is that right? How much time had 10 passed roughly? 11 A. I can't say really. I can't remember. 12 Q. And did she have a conversation with you 13 at this meeting at your house? 14 A. Yeah. Well, naturally we had to speak. 15 Q. And as a result of having this 16 conversation Ms. -- with Ms. McDaid, what did you 17 understand was going on? 18 MR. MacFADYEN: Objection. Hearsay. 19 MR. McADAMS: Objection. Calls for 20 hearsay. 21 A. Well, I understand then -- then that they 22 were more or less using people. 23 Q. Who's "they"? 24 A. The Camadres (sic) for investment purposes 25 which, to me, was not very ethical.</p>
<p style="text-align: right;">Page 114</p> <p>1 A. Or called, called up and she -- I don't 2 know exactly. I can't really remember to tell you 3 the truth. 4 Q. How did it come to pass that she showed up 5 at your house? 6 A. I don't know. 7 Q. Did she just show up on her own? Had you 8 ever talked to her? 9 A. I never talked to -- no, I never talked to 10 her. I may have talked to her on the telephone. 11 Q. Is it -- is it your best recollection that 12 you spoke with her on the telephone before she 13 showed up at your house for the first time? 14 A. No, I -- I can't remember. 15 Q. Did you invite her over the house or did 16 she come on her own? 17 A. I believe she came on her own. I'm not 18 sure. I didn't recollect inviting any -- anybody to 19 -- to the house. 20 Q. And when you first met with her, when she 21 arrived at your house on her own, was that in the 22 wintertime of this year? 23 A. Not this year. It was -- I can't 24 remember. 25 Q. Well, was it after you had met with</p>	<p style="text-align: right;">Page 116</p> <p>1 Q. Why? 2 A. Why? Because the people didn't know they 3 were making money off them. 4 Q. How do you know? 5 A. I found out. 6 Q. From who? 7 A. I'd rather not say. 8 Q. Well, you're going to have to, sir. 9 A. All right. Well, I found out from Pam and 10 I found out from other -- no. I -- no, there was 11 nobody else that told me. I was thinking Sandy did 12 but it was -- Pam told me that they were using the 13 people. And that was -- made me form -- informed. 14 MR. MacFADYEN: Objection. Nonresponsive. 15 Motion to strike. 16 Q. Did she say to you that it was unethical? 17 A. No. I knew it was unethical. 18 Q. Did you consider it unethical for people 19 to have joint accounts together? 20 A. No. 21 Q. What's unethical, sir? 22 A. They were taking older people on -- on 23 their death beds and offering them \$3,000, which is 24 fine, there's nothing wrong with giving people money 25 if they need it, but it seems they were using it to</p>

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1 invest in themselves as a family.
2 **Q. Would you agree that that was proper if**
3 **the people they spoke with agreed to do that?**

4 A. If they got 50 percent of it, half and
5 half, if it was a joint account like.

6 **Q. So -- so your objection is that they**
7 **weren't being paid enough money?**

8 A. Well, they -- they didn't know that the
9 Camarades were using them to enhance their own
10 station in life with stocks and bonds and things.

11 **Q. Is that what Ms. McDaid told you?**

12 MR. McADAMS: Objection.

13 A. No.

14 MR. McADAMS: Hearsay.

15 A. She didn't tell me that exactly.

16 **Q. Well, how did you find that out then, sir?**
17 **Who told you that?**

18 A. I heard it through -- more or less through
19 the grapevine.

20 **Q. What grapevine?**

21 A. It was -- it was expressed by some of the
22 people that came to the house. They -- for
23 instance, Sandy, she -- although she was the one
24 that introduced it, she I think knew that they were
25 making money off the clients.

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1 **Q. And did she tell you that?**

2 MR. MacFADYEN: Objection.

3 MR. McADAMS: Objection. Hearsay.

4 A. She did not tell me that.

5 **Q. Well, how do you know she -- she knew**
6 **this?**

7 A. I don't know for sure.

8 **Q. You're just assuming this?**

9 A. Well, why would the government bother to
10 go after them?

11 **Q. How did you know the government was**
12 **bothering to go after them? Did Ms. McDaid tell you**
13 **that?**

14 A. She came to the house, went into a card,
15 and asked me if I had any business -- it all started
16 with that telephone call when they said they were
17 going to go further with it.

18 **Q. Who's "they"?**

19 A. A Mr. -- somebody from down Louisiana I
20 believe it was.

21 **Q. So somebody from TradeKing?**

22 THE WITNESS: Is that where TradeKing is?

23 MR. FLANDERS: I don't know. I'm asking
24 you.

25 A. I don't know where TradeKing is.

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1 **Q. Well, who was it? Who was it that you**
2 **spoke with?**

3 A. It was -- I forgot what the man's name is
4 at -- I can't -- I can't tell you exactly what his
5 name was but I think it was Hart. Not Hart. I've
6 got so God damn many things going on at once here.
7 But I know that...

8 **Q. All right. So you got a telephone call**
9 **from somebody asking you about an account you had**
10 **opened supposedly?**

11 A. Yes. And that's -- that's when I first
12 heard about it.

13 **Q. And then you had a visit from Ms. McDaid**
14 **connected with that?**

15 A. Then I had a visit from the FBI. It must
16 have been connected with that because they said,
17 "We're going to go further into investigating this."

18 **Q. Who said that?**

19 A. The person on the telephone.

20 **Q. Did Ms. McDaid tell you that as well?**

21 A. No.

22 **Q. Did she tell you the government was**
23 **thinking about prosecuting the Caramadres?**

24 A. After she -- she came to the house and
25 told me that they were looking into it, and that was

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1 after the phone call from down south somewhere.

2 **Q. Okay.**

3 A. Louisiana.

4 **Q. Now, didn't -- didn't you actually meet**
5 **with Ms. McBaid -- Ms. McDaid to go over some**
6 **paperwork that you had received from this brokerage**
7 **firm?**

8 THE WITNESS: What brokerage firm?

9 MR. FLANDERS: TradeKing.

10 A. Oh, TradeKing, yes. I don't know who
11 TradeKing is. I can't -- she came to the house
12 because I didn't know how to fill out the forms. I
13 didn't even know what they were asking half of them.
14 So I was -- I was upset and I called her and asked
15 her if she could come down and tell me what this was
16 all about, and she did and she -- she helped me.

17 **Q. And she worked with you to actually fill**
18 **out the form?**

19 A. She told me -- read it and she said,
20 "Well, you have no computers here so just write no."

21 **Q. Didn't she actually write in the answers**
22 **on the form?**

23 A. No, I did.

24 **Q. Okay.**

25 A. As far as I know.

<p style="text-align: right;">Page 121</p> <p>1 Q. Let's take a look at that. That's Exhibit 2 4. Take a look at this. This is a letter dated 3 April 6th, 2009 to you from this fellow Shawn Moylan 4 at TradeKing; is that right? 5 A. I don't remember a man by the name of 6 Shawn Moylan. 7 Q. Do you remember getting this letter? 8 A. No. 9 Q. All right. The second page is a document 10 that's entitled "Affidavit of Fraud." Do you see 11 that? 12 A. Yup. 13 Q. Is this the document you and Ms. McDaid 14 filled out together? 15 A. I don't believe so. Let me look at 16 another one. 17 Q. Sure. Take your time. 18 A. I signed it -- again, let me look. 19 Q. Again, we're looking at Exhibit 4 and at 20 the back there's a -- this might be clearer. If you 21 take a look at the document that's been marked as an 22 exhibit, at the back, let me direct your attention 23 to the last page. Okay. 24 A. That's me. 25 Q. Is that your signature?</p>	<p style="text-align: right;">Page 123</p> <p>1 Q. Okay. And she helped you to fill out the 2 answers? 3 A. No. All she did was tell me that I had 4 none of these things so that, "You should say no," 5 and -- and I did. 6 Q. Did she show you a copy of Government's 7 Exhibit 2? If I can have that please? 8 A. Okay. I signed that? 9 Q. Yup. Did she show you this document that 10 you had signed, Exhibit 2? 11 A. I can't remember. 12 Q. Do you remember signing this document for 13 Raymour? 14 A. What, the same one? No, I don't -- 15 Q. You do admit -- 16 A. -- remember all -- all that. 17 Q. You signed a bunch of documents for 18 Raymour, didn't you? 19 A. Yes. 20 Q. And he read to you from these documents, 21 didn't he? 22 A. He read about a half a paragraph as we 23 went to another one and right down the line. 24 Q. And he read to you from each of them, 25 correct?</p>
<p style="text-align: right;">Page 122</p> <p>1 A. That is. 2 Q. Okay. Is that your handwriting, "No 3 account"? 4 A. "No account." 5 Q. Did Ms. McDaid write in -- 6 A. No. 7 Q. -- answers for you? 8 A. No. 9 Q. Is that your handwriting on -- on page -- 10 A. I believe so. 11 Q. -- page 17? 12 A. I believe so. 13 Q. Was she reading to you from this document 14 as you were filling it out? 15 A. Well, I was reading and she was reading, a 16 little of both. 17 Q. You were both reading it together? 18 A. Together. 19 Q. Okay. 20 A. A round circular table. 21 Q. And who else was there when you filled 22 this out? 23 A. Nobody. 24 Q. Just the two of you? 25 A. Right.</p>	<p style="text-align: right;">Page 124</p> <p>1 A. A little bit of something. 2 Q. And you read -- and you read some of them 3 yourself, didn't you? 4 A. No. 5 Q. You partially read some of them, didn't 6 you? 7 A. A little bit with -- with him. 8 Q. Yeah. 9 A. And he said, "Sign here and here," so... 10 Q. And he spent an hour and a half with you 11 going over these documents, didn't he? 12 A. About -- well, I don't about an hour and a 13 half, but it seemed like a long time to me. 14 Q. Yup. And he -- and he had actually two 15 meetings with you where he showed you these 16 documents; isn't that right? 17 A. I recollect one meeting. 18 Q. Well, you had the first meeting -- 19 A. Yup. 20 Q. -- with Mr. Sayles, right, where he 21 explained to you what this was all about; is that 22 right? 23 A. Yeah. 24 Q. And at that meeting, he showed you the 25 blank forms of the documents that he was going to</p>

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1 use and explained to you how it would work?
 2 A. I don't remember him showing me any blank
 3 forms.
 4 Q. Well, didn't he discuss with you -- didn't
 5 he have documents that he showed you at that
 6 meeting?
 7 THE WITNESS: The second meeting?
 8 MR. FLANDERS: No, the first meeting when
 9 Mr. Sayles was there.
 10 A. He did, yeah.
 11 Q. All right. And he went through and he
 12 read the documents partially to you as you say?
 13 A. Yeah.
 14 Q. And -- and -- explained to you what this
 15 was going to involve?
 16 A. No. He never explained what it was going
 17 to involve.
 18 Q. He just read from the documents?
 19 A. Yeah.
 20 Q. Okay. And did you tell him that you
 21 didn't understand what he was saying?
 22 A. No. I just -- I wanted the money so I
 23 went along with it.
 24 Q. That's right. And you then invited him to
 25 come back again, right, to sign them up and get your

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1 money?
 2 A. Yes, I did.
 3 Q. And, in fact, he came back nine or ten
 4 days later with the same documents and asked you to
 5 sign them up?
 6 A. I don't know why I can't remember whether
 7 they're the same documents or not.
 8 Q. Okay. But he came back with documents,
 9 right, and again he read to you from the documents?
 10 A. I can't remember.
 11 Q. Well, you don't deny that he read to you
 12 from the documents, do you?
 13 A. Well, I -- he denied -- I can't deny that
 14 he didn't read something from some documents.
 15 Q. Okay. At any --
 16 A. I didn't see them.
 17 Q. At any point after he read to you from the
 18 documents and talked with you for an hour and a half
 19 at this second meeting, did you tell him, "I don't
 20 want to do this"?
 21 A. No.
 22 Q. Did you tell him, "I don't understand what
 23 you're talking about"?
 24 A. No, I didn't.
 25 Q. And after he got finished in talking with

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1 you and reading from the documents, you decided to
 2 go ahead and sign them, didn't you?
 3 A. Certainly, I did.
 4 Q. And you knew you had to sign them in order
 5 to get the 3,000 or whatever number the thousands of
 6 dollars you received?
 7 A. Three, right.
 8 Q. And -- and he actually paid you that
 9 money, didn't you -- didn't he?
 10 A. Yes, he did.
 11 Q. Okay. And have you ever offered to return
 12 that money?
 13 A. No, I haven't but I could.
 14 Q. But you haven't to date?
 15 A. No.
 16 Q. Despite knowing that you have signed
 17 documents authorizing a joint account to be created
 18 --
 19 A. No, no.
 20 Q. -- you have not offered to return that
 21 money?
 22 MR. McADAMS: I'm going to object to a good
 23 faith --
 24 THE WITNESS: Not --
 25 MR. McADAMS: -- basis for this question

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1 when counsel is aware of an offer made to counsel at
 2 this meeting to return the money and you indicated
 3 that you were going to ask Mr. Caramadre if he wanted
 4 the money back, so I'd ask if you'd question yourself
 5 if you have a good faith basis for this question.
 6 MR. FLANDERS: I have a very good faith
 7 basis for it. He just told me --
 8 MR. McADAMS: We have a recording.
 9 MR. FLANDERS: -- he never offered to
 10 return it and he didn't.
 11 THE WITNESS: Mr. Sayles did.
 12 BY MR. FLANDERS:
 13 Q. But you -- you never did, did you?
 14 A. (Non-verbal response.)
 15 Q. You never indicated that --
 16 THE REPORTER: Excuse me.
 17 Q. You never did, did you?
 18 A. I never did, no.
 19 Q. Now, isn't it true, sir, that as a result
 20 of meeting with Raymour, you are \$3,000 richer than
 21 you were before that meeting?
 22 A. Yes.
 23 Q. And you haven't ever lost any money on
 24 account of meeting with Raymour, have you?
 25 A. No.

<p style="text-align: right;">Page 129</p> <p>1 Q. Or with the Caramadres?</p> <p>2 A. No.</p> <p>3 Q. And you disclaim any interest in any joint</p> <p>4 account that was created; is that right?</p> <p>5 A. Right.</p> <p>6 Q. So if there is a joint account that bears</p> <p>7 your name, you're telling us you have no interest in</p> <p>8 any monies that are in there; is that right?</p> <p>9 A. No, not right.</p> <p>10 Q. What -- what -- what are you saying?</p> <p>11 A. Anything that I signed concerning this</p> <p>12 whole matter was done in a state of duress more or</p> <p>13 less and to me it just did not seem ethical. I mean</p> <p>14 there's nothing wrong with having joint accounts</p> <p>15 with people, but the thing is taking somebody like</p> <p>16 me who they damn well know is going to grab for it</p> <p>17 more or less, the cash, because they need it at that</p> <p>18 point in their life, they need to help pay up their</p> <p>19 bills maybe, buy a funeral plot. And they were</p> <p>20 using the money for their own benefit, not the -- if</p> <p>21 you say like a trust, it was not for the benefit of</p> <p>22 a trust, it was for their personal gain.</p> <p>23 Q. Did you think this was unethical at any</p> <p>24 time when you signed the documents?</p> <p>25 A. I cannot say really yes or no to that.</p>	<p style="text-align: right;">Page 131</p> <p>1 Q. And you thought that was unethical?</p> <p>2 A. Yeah, I thought that was unethical.</p> <p>3 Q. Even if you or others agreed to it?</p> <p>4 A. Well, I agreed to it when I -- I guess</p> <p>5 when I signed up with Raymour.</p> <p>6 Q. Right.</p> <p>7 A. But had I known, I would not have signed</p> <p>8 up with them.</p> <p>9 Q. When you say had you known, didn't he go</p> <p>10 over it with you in detail?</p> <p>11 A. He didn't go over it in any detail</p> <p>12 whatsoever.</p> <p>13 Q. All right. You have had these documents</p> <p>14 at least since I provided you with a copy of them,</p> <p>15 right?</p> <p>16 THE WITNESS: When -- when did you provide</p> <p>17 me one?</p> <p>18 Q. Didn't I give you copies when we met this</p> <p>19 year at your house when you secretly recorded the</p> <p>20 meeting?</p> <p>21 A. No. I don't remember you doing that.</p> <p>22 Q. You don't remember me giving you the</p> <p>23 documents?</p> <p>24 A. No. I don't remember that.</p> <p>25 Q. Leaving you and Mr. Sayles with copies of</p>
<p style="text-align: right;">Page 130</p> <p>1 That's a beauty. I -- I don't know.</p> <p>2 Q. Did you think it was unethical when you</p> <p>3 took \$3,000 from Raymour?</p> <p>4 A. No.</p> <p>5 Q. In fact, you didn't think anything was</p> <p>6 unethical until after you'd met with Ms. McDaid;</p> <p>7 isn't that right?</p> <p>8 A. Not --</p> <p>9 Q. Wasn't that the first time?</p> <p>10 A. Yeah, yeah, yeah, yeah, more or less.</p> <p>11 Q. Yeah, because she told you that these</p> <p>12 people were taking money from poor people, right?</p> <p>13 Right?</p> <p>14 MR. McADAMS: Objection.</p> <p>15 MR. MacFADYEN: Objection.</p> <p>16 A. No, she didn't tell me they were taking</p> <p>17 money from poor people.</p> <p>18 Q. What did she tell you that made you think</p> <p>19 it was unethical?</p> <p>20 MR. MacFADYEN: Objection.</p> <p>21 MR. McADAMS: Objection. Hearsay.</p> <p>22 A. The fact that there was money given to</p> <p>23 people for investment purposes and then they used it</p> <p>24 for themselves with this -- what was it, TradeKing</p> <p>25 business.</p>	<p style="text-align: right;">Page 132</p> <p>1 everything that you signed?</p> <p>2 A. No. I don't remember that and I don't</p> <p>3 think Mr. Sayles will either.</p> <p>4 Q. Is it possible you just don't remember?</p> <p>5 A. No, I would remember.</p> <p>6 Q. You remember me giving you the documents?</p> <p>7 A. No, I don't remember you giving me any</p> <p>8 documents.</p> <p>9 Q. Okay. Now, you were sent a copy --</p> <p>10 MR. FLANDERS: If I can have the exhibits</p> <p>11 that were marked, please.</p> <p>12 MR. McADAMS: I gave you an entire set.</p> <p>13 MR. FLANDERS: I thought we -- we were</p> <p>14 going to be using the originals --</p> <p>15 MR. McADAMS: The reason I gave you the</p> <p>16 entire set was so that you could have a copy to use.</p> <p>17 It's the only one that --</p> <p>18 MR. FLANDERS: I thought you wanted the</p> <p>19 witness to see the originals.</p> <p>20 MR. McADAMS: They're all the same except</p> <p>21 for --</p> <p>22 MR. FLANDERS: Except that some are better</p> <p>23 copies.</p> <p>24 MR. McADAMS: -- some are a better copy.</p> <p>25 But here you go. You can have all of mine.</p>

<p style="text-align: right;">Page 133</p> <p>1 BY MR. FLANDERS:</p> <p>2 Q. The government marked as Exhibit 3 a</p> <p>3 document that appears to be an account statement for</p> <p>4 TradeKing with your name on it; is that right?</p> <p>5 A. Yup.</p> <p>6 Q. When did you first see this?</p> <p>7 A. When did I first see it? I don't</p> <p>8 remember. I don't recollect but I think -- no, I</p> <p>9 never -- I never saw it maybe until yesterday or</p> <p>10 today. But I know I never saw any document with my</p> <p>11 name on it with anywhere near that sort of money on</p> <p>12 there.</p> <p>13 Q. Before today, have you -- did you see</p> <p>14 Exhibit 1, the Agreement and Acknowledgment?</p> <p>15 A. I never saw that.</p> <p>16 Q. You never saw that before today?</p> <p>17 A. No. Yesterday or today.</p> <p>18 Q. First time?</p> <p>19 A. First time.</p> <p>20 Q. Do you admit that that's your signature on</p> <p>21 the third page of Exhibit 1?</p> <p>22 A. That looks like it. That does look like</p> <p>23 it.</p> <p>24 Q. Okay. Is it your recollection that this</p> <p>25 was one of the documents that Raymour read to you</p>	<p style="text-align: right;">Page 135</p> <p>1 MR. McADAMS: Objection.</p> <p>2 Q. Is that right?</p> <p>3 A. I wouldn't think so --</p> <p>4 Q. All right.</p> <p>5 A. -- if I had nothing in it. But who knows,</p> <p>6 somebody could put something in it and say I did and</p> <p>7 I -- and I didn't.</p> <p>8 Q. But -- but to your knowledge, you haven't</p> <p>9 put any money into it?</p> <p>10 A. Nothing. Don't even know who they are.</p> <p>11 MR. FLANDERS: Okay. Why don't we stop</p> <p>12 here. I have a few more questions but I think I'm</p> <p>13 almost done.</p> <p>14 MR. McADAMS: Well, it's about five of</p> <p>15 twelve. Do you think you want to do your last five</p> <p>16 minutes and be done and we'll go on to the next</p> <p>17 questioner?</p> <p>18 MR. FLANDERS: Let's -- let's break here</p> <p>19 and then we'll take it from there.</p> <p>20 THE VIDEOGRAPHER: We're going off the</p> <p>21 record. The time is 11:58.</p> <p>22 (Lunch recess)</p> <p>23 THE VIDEOGRAPHER: The time is 1:03. We're</p> <p>24 back on the record.</p> <p>25 BY MR. FLANDERS:</p>
<p style="text-align: right;">Page 134</p> <p>1 when you met?</p> <p>2 A. I don't know. He's sitting right where he</p> <p>3 is and I'm over here, and he was sitting on -- on</p> <p>4 the floor. And we had a -- one of those little old</p> <p>5 wooden tables, and he was reading and flipping over</p> <p>6 like this, and I was sitting in the chair.</p> <p>7 Q. Okay.</p> <p>8 A. And I don't remember seeing that.</p> <p>9 Q. Going back to Exhibit 3, which is the</p> <p>10 account that is with TradeKing, did you invest any</p> <p>11 money in this account?</p> <p>12 A. No.</p> <p>13 Q. And --</p> <p>14 A. I had no money to invest.</p> <p>15 Q. Okay. And you have no -- so any money</p> <p>16 that was put into this account didn't come from you?</p> <p>17 A. No.</p> <p>18 Q. And do you have any claim to any of the</p> <p>19 money in the account?</p> <p>20 A. Why would I; I never put anything into it.</p> <p>21 Q. Is that answer no, that you have no claim?</p> <p>22 A. No claim.</p> <p>23 Q. Okay. So if this -- if this account were</p> <p>24 to be liquidated immediately, you would have no</p> <p>25 claim to any assets?</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. Good afternoon, Mr. Wiley.</p> <p>2 A. Good afternoon again.</p> <p>3 Q. We're back -- back on the record again.</p> <p>4 When Mr. Pine was questioning you previously, he</p> <p>5 asked you about medications that you were taking?</p> <p>6 A. Yes.</p> <p>7 Q. And you -- you pulled out that little</p> <p>8 black book in your pocket to reference what it is</p> <p>9 that you're taking by way of medications. What is</p> <p>10 that little black book?</p> <p>11 A. It's just a -- where I've got all my</p> <p>12 medical crap down there, New Haven Veterans Hospital</p> <p>13 one. Nothing particular, just --</p> <p>14 Q. Does it -- does it have a listing of the</p> <p>15 medications that you take?</p> <p>16 A. Yeah.</p> <p>17 Q. Would you be willing to provide us with a</p> <p>18 copy of that?</p> <p>19 A. What, the medications? Sure.</p> <p>20 Q. Yeah, the -- and anything else about your</p> <p>21 health that's in that book?</p> <p>22 A. Well, you can get it from the V.A.</p> <p>23 Q. But can -- would you give us a copy of</p> <p>24 that?</p> <p>25 A. Yeah, but it doesn't -- I -- I need --</p>

<p style="text-align: right;">Page 137</p> <p>1 need this. I'll give you a copy. I'll give you a 2 copy of that. Here's the medications. It's not 3 much, nothing that says I'm nuts although I think 4 you hope it does. 5 Q. Although what? 6 A. I think you hope it does. No way. Not 7 much it's just -- it's got all the doctors listed 8 down there that works on me and the oncologist and 9 all. 10 Q. If we could just get a copy of that page? 11 A. Oh, I'll give it to you. 12 Q. Okay. You don't -- you don't -- you can 13 -- you don't have to take it out. You can just -- 14 they'll make a copy of it. 15 MR. McADAMS: May I make a suggestion? 16 Maybe we'll just read it into the record? 17 MR. FLANDERS: Yeah. Why don't we just 18 read this into the record and you can get the 19 spelling from here. But it's dated the 9/24 and it 20 says lactulose as of 9/23. That's L-A-C-T-U-L-O-S-E. 21 trazadone, T-R-A-Z-A-D-O-N-E. Also on medication as 22 needed for seizure, R-E-S-P-. distress, agitation, 23 pain, and it looks like secretions. And then the 24 medicines are listed as Ativan, A-T-I-V-A-N, 25 morphine, Ativan again. It looks like tramadol,</p>	<p style="text-align: right;">Page 139</p> <p>1 Q. So he's a friend. Okay. And do you know 2 how they share under your will, in what percentages? 3 A. I don't know. I don't think there will be 4 anything for them anyhow, but I didn't make any 5 percentages. I forgot the lawyer's name, but there 6 is a will and it's made out up in -- it's in 7 Westerly, I guess recorded in Westerly. I don't 8 know whether or not they record the wills in the 9 town hall. 10 Q. Do you know what lawyer drew it up? 11 A. A friend of Mr. Sayles. And I forgot his 12 name. 13 Q. When did you prepare this will? 14 A. Oh, several months ago. 15 Q. This year though? 16 A. This year, yes. 17 Q. When did you prepare it relative to 18 signing up and -- with Raymour? 19 A. Oh, hell, way afterwards. 20 Q. After that? 21 A. Yeah. 22 Q. Okay. Does -- does -- to your knowledge, 23 does Mr. Sayles know that he is a beneficiary under 24 your will? 25 A. Yes. I told him he was.</p>
<p style="text-align: right;">Page 138</p> <p>1 T-R-A-M-A-D-O-L. 2 A. I don't know for sure. 3 Q. And Levsin, L-E-V-S-I-N. 4 A. Right. 5 Q. Did you write that down? 6 A. The nurse did at my request. 7 Q. And that represents the medications you're 8 presently taking? 9 A. That I'm presently taking. 10 Q. Okay. Now, do you have a will, Mr. Wiley? 11 A. Yup. 12 Q. Who is the beneficiary of your will? 13 THE WITNESS: At the present time? 14 MR. FLANDERS: Right. 15 A. I have listed Mr. Sayles and Mr. -- oh, 16 what the hell, Trebisacci. I'm not sure how you 17 spell his name. Nicholas. Not Nick, I mean -- oh, 18 I forgot his first name. Now you're going to say I 19 forgot but... 20 Q. And who is that other individual that you 21 just mentioned? 22 A. Trebisacci. He owns the Westerly Marina 23 boatyard. 24 Q. Okay. 25 A. Another personal friend, another friend.</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. Now, going back to the time between the 2 first meeting you had with Raymour earlier this year 3 when Mr. Sayles was present, and the second meeting 4 that you had with Raymour alone when you signed up 5 the documents and received the money, the \$3,000 6 from him. You were asked some questions about how 7 the second meeting came about, and I think you told 8 us that you received a call from Raymour to set up 9 that second meeting. Is that right? 10 A. Yes. You see, when it was first set up, 11 they said it takes nine, ten, fifteen days to match 12 up. And so it was maybe nine, ten days later he 13 called, called me up and asked if it was all right 14 if he came down at two o'clock. He did and he 15 arrived. 16 Q. Okay. Did you have any telephone 17 conversations that you initiated between the initial 18 meeting with Raymour and Mr. Sayles and the second 19 meeting where you signed up the documents? 20 A. I can't remember. 21 Q. Do you have phone -- 22 A. I -- go ahead. 23 Q. Do you have telephone records that would 24 show what calls you made? 25 A. Well, I might have. Sometimes I save them</p>

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1 but usually I just toss out the phone bills. The
2 phone company would have them probably.

3 **Q. Okay. Would you be willing to look for**
4 **those records and produce them if you have them to**
5 **us?**

6 A. Yeah. Now, I've --

7 MR. McADAMS: Objection to the relevance
8 and this is trial testimony.

9 A. Well, I'm thinking about what -- what
10 dates would -- what month it would be, what dates it
11 would be.

12 **Q. Well, that's why I'm asking for the**
13 **records. If you made telephone calls, that would**
14 **show it.**

15 A. Yeah.

16 **Q. Would you be willing to produce copies of**
17 **that for us?**

18 A. If I could find them, I would.

19 **Q. Okay.**

20 A. I'll look and see. I've got a box that I
21 keep all my old bills in. I could probably find a
22 copy and saying paid or -- it's paid or whatever.

23 MR. FLANDERS: Okay. Okay, that's all I
24 have.

25 MR. McADAMS: We have one more attorney,

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1 Mr. -- oh, two more. Excuse me, two more attorneys
2 to question you.

3 MR. FLANDERS: Do you want to come over
4 here, John?

5 MR. MacFADYEN: No.

6 THE VIDEOGRAPHER: Can we go off the
7 record, please?

8 MR. MacFADYEN: No, we're on the record.
9 [REDACTED] my client's name, has not been
10 mentioned today and at this juncture I simply don't
11 know what, if anything, might be his exposure, what
12 the government's theory might be, and under those
13 circumstances, I can't formulate any kind of line of
14 inquiry, and consequently I'm not going to ask any
15 questions today.

16 MR. TRAINI: On behalf of [REDACTED],
17 without restating it, I adopt Mr. MacFadyen's
18 position. And I also, for the same reason, will not
19 be asking any questions today.

20 MR. McADAMS: Mr. Wiley, that means that
21 I'm going to ask you a few more questions. It's
22 what's called redirect examination.

23 THE WITNESS: Okay.

24 MR. McADAMS: And then we'll be done.

25 THE WITNESS: Good.

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1 REDIRECT EXAMINATION

2 BY MR. McADAMS:

3 **Q. Mr. Wiley, Mr. Pine asked you some**
4 **questions about some of the documents that we showed**
5 **you and he asked you how much time you had spent**
6 **when you met with Mr. Raymour Radhakrishnan. And**
7 **you had testified I believe that on the two**
8 **meetings, each time it was about an hour and a half?**

9 A. Hour, hour and a half, if it was that
10 long.

11 **Q. Okay.**

12 A. It may have been an hour. I -- I don't
13 know.

14 **Q. How much of that time that you met with**
15 **him did you spend going over the documents?**

16 A. Well, most of it but not -- well, I can't
17 say -- I can't say all of it because we -- we talked
18 and shooted the bull a little bit. But I didn't
19 actually go over the documents themselves, each --
20 each one. I looked at them and glanced at them and
21 signed them.

22 **Q. Do you have an idea of how much time you**
23 **spent sort of chitchatting as opposed to how much**
24 **time you spent discussing the documents?**

25 MR. PINE: Objection.

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1 MR. MacFADYEN: Asked and answered.

2 A. I don't really know.

3 **Q. Okay. One of the documents, Mr. Wiley, is**
4 **what we've been calling Government Exhibit 1, and it**
5 **has some language in here. For example, paragraph 1**
6 **says, "The Funds Provider and the Co-Owner" --**

7 MR. TRAINI: Objection.

8 MR. McADAMS: What's the basis of the
9 objection?

10 MR. TRAINI: This document is not in
11 evidence.

12 MR. McADAMS: Okay.

13 MR. TRAINI: And you're reading from the
14 document.

15 MR. McADAMS: Understood.

16 **Q. Paragraph 1 says, "The Funds Provider and**
17 **the Co-Owner are joint tenants with right of**
18 **survivorship in the above-referenced brokerage**
19 **account." Okay. Did Mr. Raymour explain to you**
20 **when you were going over these documents, who the**
21 **funds providers was?**

22 MR. TRAINI: Objection.

23 A. No.

24 **Q. Did he say anything to you about entering**
25 **into a joint tenant agreement?**

<p style="text-align: right;">Page 145</p> <p>1 MR. TRAINI: Objection.</p> <p>2 A. No.</p> <p>3 Q. What, if anything, did he say about joint</p> <p>4 tenants?</p> <p>5 A. Nothing.</p> <p>6 MR. TRAINI: Objection.</p> <p>7 Q. Did he go over each paragraph with you in</p> <p>8 detail?</p> <p>9 MR. TRAINI: Objection.</p> <p>10 A. No.</p> <p>11 Q. What, if anything, did he say about what</p> <p>12 your rights would be under this agreement?</p> <p>13 MR. TRAINI: Objection.</p> <p>14 A. Nothing.</p> <p>15 Q. Paragraph 7 states in part --</p> <p>16 MR. TRAINI: Objection.</p> <p>17 Q. -- that, "As a result of the optional</p> <p>18 redemption feature, the securities could yield a</p> <p>19 substantial profit for the Funds Provider if the</p> <p>20 Co-Owner dies before the Funds Provider and the</p> <p>21 securities are in the Account at the time of the</p> <p>22 Co-Owner's death." What, if anything, did</p> <p>23 Mr. Raymour (sic) say to you about substantial</p> <p>24 profit being realized as a result of this agreement?</p> <p>25 A. Nothing.</p>	<p style="text-align: right;">Page 147</p> <p>1 a half --</p> <p>2 A. Well --</p> <p>3 Q. -- correct?</p> <p>4 A. -- it probably was not an hour, an hour</p> <p>5 and a half.</p> <p>6 Q. But --</p> <p>7 A. And it was very quickly. We read the --</p> <p>8 he read them off, the top off, and then why I signed</p> <p>9 them and that was it.</p> <p>10 Q. Right, right. So he did go through them</p> <p>11 with you?</p> <p>12 A. Yeah, but not to any extent to explain to</p> <p>13 me what they were.</p> <p>14 Q. Right. But my question is when you just</p> <p>15 responded to Mr. McAdam that he didn't say this or</p> <p>16 he didn't say that, as we sit here today do you have</p> <p>17 a specific memory of that, or you don't recall</p> <p>18 whether he -- he said something about those terms?</p> <p>19 A. Well, I cannot say -- truthfully, I cannot</p> <p>20 say, but I do not have any -- any -- any specific</p> <p>21 time element or -- or anything along that line. I</p> <p>22 know that we spent just a very little while reading</p> <p>23 them over and that was it.</p> <p>24 Q. So if I understand you correctly, you're</p> <p>25 not saying he didn't cover it, you're saying you</p>
<p style="text-align: right;">Page 146</p> <p>1 MR. TRAINI: Objection.</p> <p>2 A. Nothing.</p> <p>3 Q. What, if anything, did he say to you about</p> <p>4 entering into any type of contract or joint account</p> <p>5 agreement?</p> <p>6 MR. TRAINI: Objection.</p> <p>7 A. Nothing.</p> <p>8 MR. McADAMS: Okay. I have no further</p> <p>9 questions for you, Mr. Wiley. Thank you.</p> <p>10 MR. PINE: Could I use the mike or a mike?</p> <p>11 RECROSS-EXAMINATION</p> <p>12 BY MR. PINE:</p> <p>13 Q. Mr. Wiley.</p> <p>14 A. Yes.</p> <p>15 Q. In response to several -- excuse me,</p> <p>16 several questions that Mr. McAdam (sic) just asked</p> <p>17 you, you answered "nothing" in terms of what Raymour</p> <p>18 went over with you?</p> <p>19 A. Well, nothing -- nothing in specific about</p> <p>20 anything.</p> <p>21 Q. Well, that's my question. Do you have --</p> <p>22 as we sit here today, you've talked about the fact</p> <p>23 that Raymour went through the documents, you had a</p> <p>24 chance to read the documents, you discussed the</p> <p>25 documents over the course of that hour, an hour and</p>	<p style="text-align: right;">Page 148</p> <p>1 don't remember today --</p> <p>2 A. To what extent, no.</p> <p>3 Q. -- to what extent it was covered; isn't</p> <p>4 that correct?</p> <p>5 A. Yes, to an ex -- well, I was going to say</p> <p>6 to an extent again but --</p> <p>7 Q. What's that?</p> <p>8 A. -- it's true. I was going to say to an</p> <p>9 extent again. I do not re --</p> <p>10 Q. Right. But you have testified about him</p> <p>11 going through the documents with you so --</p> <p>12 A. Briefly. Put it that way.</p> <p>13 Q. Well, didn't you say earlier that you</p> <p>14 spent most of the time --</p> <p>15 A. It was no hour, hour and a half.</p> <p>16 Q. I'm sorry?</p> <p>17 A. It was no hour, an hour and a half I don't</p> <p>18 believe.</p> <p>19 Q. Well, you didn't talk about cars or the</p> <p>20 Red Sox for that hour and a half, did you?</p> <p>21 A. No. We did for a little while afterwards.</p> <p>22 Q. Part of the meeting?</p> <p>23 A. Yeah.</p> <p>24 Q. And another part of the meeting was</p> <p>25 devoted to Raymour explaining the program to you and</p>

<p style="text-align: right;">Page 149</p> <p>1 the gift of the money and the --</p> <p>2 A. A little bit. No, he didn't say about the</p> <p>3 gift of the money. He just said that it was a</p> <p>4 philanthropist --</p> <p>5 Q. Correct.</p> <p>6 A. -- from Providence.</p> <p>7 Q. That's what I mean.</p> <p>8 A. And it didn't take him very long to say</p> <p>9 that.</p> <p>10 Q. But you also have testified that in the</p> <p>11 meetings, he went over the documents with you?</p> <p>12 A. Yeah. He -- well, he showed them to me</p> <p>13 like you just showed them to me here.</p> <p>14 Q. Correct.</p> <p>15 A. Very brief.</p> <p>16 Q. And we've also established that you</p> <p>17 understood and understand today many of the terms</p> <p>18 that are referenced in those documents, like joint</p> <p>19 account, co-owner?</p> <p>20 A. Oh, certainly.</p> <p>21 Q. Okay. And --</p> <p>22 A. I understand.</p> <p>23 Q. So when you said to Mr. McAdam --</p> <p>24 A. I had parents who had --</p> <p>25 Q. I'm sorry?</p>	<p style="text-align: right;">Page 151</p> <p>1 MR. PINE: Objection.</p> <p>2 Q. -- understanding of what it was that you</p> <p>3 were entering into at that time?</p> <p>4 MR. PINE: Objection. Note the objection</p> <p>5 --</p> <p>6 A. No.</p> <p>7 MR. PINE: -- to re-redirect.</p> <p>8 A. No.</p> <p>9 MR. McADAMS: No further questions.</p> <p>10 THE VIDEOGRAPHER: The time is 1:21. The</p> <p>11 deposition is concluded. We're off the record.</p> <p>12 (Adjourned at 1:21 p.m.)</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 150</p> <p>1 A. I had parents who had stocks and bonds and</p> <p>2 things of that sort.</p> <p>3 Q. Sure, sure.</p> <p>4 A. So I naturally understood from them</p> <p>5 telling me.</p> <p>6 Q. Correct. So when you said to Mr. McAdam</p> <p>7 did he reference a particular term and you answered</p> <p>8 that he did not, you're not saying that you remember</p> <p>9 every minute of that meeting and he didn't refer to</p> <p>10 something, are you?</p> <p>11 A. No.</p> <p>12 Q. You're saying you don't recall every</p> <p>13 minute of that meeting?</p> <p>14 A. Not every minute of everything.</p> <p>15 Q. Correct.</p> <p>16 MR. McADAMS: Mr. Wiley --</p> <p>17 MR. PINE: Nothing further.</p> <p>18 MR. McADAMS: Mr. Wiley --</p> <p>19 MR. PINE: I object to any re-redirect.</p> <p>20 FURTHER EXAMINATION</p> <p>21 BY MR. McADAMS:</p> <p>22 Q. Mr. Wiley, did you have an understanding</p> <p>23 of what the documents were that you were signing?</p> <p>24 A. No.</p> <p>25 Q. And did you have an --</p>	<p style="text-align: right;">Page 152</p> <p>1 CERTIFICATE</p> <p>2 I, Diane J. DeStefano, a Notary Public in and for the</p> <p>3 State of Rhode Island, duly commissioned and</p> <p>4 qualified to administer oaths, do hereby certify that</p> <p>5 the foregoing deposition of Richard G. Wiley a</p> <p>6 Witness in the above-entitled cause, was taken before</p> <p>7 me on behalf of the United States Attorney, at 77</p> <p>8 Watch Hill Road, Westerly, Rhode Island,</p> <p>9 on September 30, 2009, that previous to examination</p> <p>10 of said witness, who was of lawful age, he was first</p> <p>11 sworn by me and duly cautioned and sworn to testify</p> <p>12 the truth, the whole truth, and nothing but the</p> <p>13 truth, and that he thereupon testified as in the</p> <p>14 foregoing manner as set out in the aforesaid</p> <p>15 transcript.</p> <p>16 I further certify that the foregoing deposition was</p> <p>17 taken down by me in machine shorthand and was later</p> <p>18 transcribed by computer and that the foregoing</p> <p>19 deposition is a true and accurate record of the</p> <p>20 testimony of said witness.</p> <p>21 Pursuant to Rule 5(d) and 30(f) of the Federal Rules</p> <p>22 of Civil Procedure, original transcripts shall not be</p> <p>23 filed in court; therefore, the original is delivered</p> <p>24 and retained by the United States Attorney's Office.</p> <p>25 A correction and signature page was not requested.</p> <p>IN WITNESS WHEREOF I hereunto set my hand this</p> <p>10th day of October, 2009</p> <p>Diane J. DeStefano, Notary Public</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>